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ABSTRACT

The Emergency School Aid Act (ESAA) of 1972 authorizes grants or contracts to nonprofit organizations (NPOs) and local education agencies (LEAs) to support the LEAs' efforts to desegregate or to reduce minority group isolation or its effects. The NPO program is a small component of ESAA which provides financial assistance to community organizations to support the LEAs' efforts. NPOs are funded on the assumption that certain activities related to school desegregation can be effectively performed by organizations outside the regular school district structure. Part I of this study focuses on the Federal level implementation of the NPO program, and explores the political context of NPO program development, the rationale for the community groups provision of the legislation, and the relationship between aspects of Federal program implementation and local NPO operations. The second part of the study reports on the criteria used in awarding grants under the ESAA's NPO program and analyzes these criteria for their performance in accomplishing the proper targeting of grant funds. (Author/RLV)

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AN EVALUATION OF THE EMERGENCY SCHOOL AID ACT NONPROFIT ORGANIZATION PROGRAM: VOL. I, AN ANALYSIS OF FEDERAL PROGRAM IMPLEMENTATION AND FUNDING PROCEDURES

PREPARED FOR THE U.S. OFFICE OF EDUCATION
DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

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R-2312/1-HEW
DECEMBER 1978

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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PREFACE

The Emergency School Aid Act (ESAA) of 1972 authorizes grants or contracts to nonprofit organizations (NPOs) and local education agencies (LEAs) to support the LEAs' efforts to desegregate or to reduce minority group isolation or its effects. The NPO program is a small component of ESAA which provides financial assistance to community organizations to support the LEAs' efforts. NPOs are funded on the assumption that certain activities related to school desegregation can be effectively performed by organizations outside the regular school district structure.

The Rand Corporation conducted an evaluation of the NPO program for the Office of Planning, Budgeting, and Evaluation (OPBE) of the U.S. Office of Education under Contract No. 300-76-0311, with Stephen Crocker as Principal Investigator from August 1976 through August 1978, and Jackie Kimbrough as Principal Investigator through December 1978. The research results are reported in four volumes, which have the common title, *An Evaluation of the Emergency School Aid Act Nonprofit Organization Program.*

Volume I, *An Analysis of Federal Program Implementation and Funding Procedures* (J. Kimbrough and J. Hyman, R-2312/1-HEW), examines the legislative and programmatic history of the ESAA-NPO program and analyzes the grant awards process for NPOs.

Volume II, *A Description of Local Program Operations* (S. Crocker and P. W. Sperlich, R-2312/2-HEW), describes NPO operations at the local school district level.

Volume III, *The Role of Community Organizations in Facilitating School Desegregation* (L. McDonnell and G. Zellman, R-2312/3-HEW), compares the effectiveness of ESAA-NPOs and non-ESAA community organizations.

Volume IV, *Conclusions and Policy Recommendations* (J. Kimbrough and S. Crocker, R-2312/4-HEW), summarizes study findings and presents specific policy recommendations.

The present report, Volume I, is divided into two parts. Part I, by Jackie Kimbrough, explores the political context in which the program was developed, the rationale for the community groups provisions,

and the relationship between aspects of federal-level program implementation and local-level operations. Part II, by James Hyman, describes the NPO funding process and analyzes the awards criteria and the relationship between NPO proposal scores and impact, as measured by the evaluation.

This volume is addressed to NPO personnel, to federal agency and school district personnel associated with the NPO program, and to education professionals interested in the role of community organizations in facilitating school desegregation.

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We acknowledge with gratitude the valuable contributions of a number of people. Susan Reese and Joanne Wuchitech sensitively made initial contact with potential respondents and efficiently set up the field trips. We are also grateful to Rand consultant J. Alfred Cannon, and to Advisory Committee members Jess Pat Elliot, Joanne Fountain, Winifred Green, Ruby Martin, Muriel Snowden, and Newman Walker for sharing their knowledge of school desegregation and community organizations. The report has been strengthened considerably by the thoughtful comments of reviewers Henry Acland, Gary Orfield, Robert Crain, and William Rogers.

The technical monitor, Robert York of the U.S. Office of Education, has also provided input which has substantially improved the report. We gratefully acknowledge assistance from the Equal Educational Opportunities Program at the U.S. Office of Education, and to the many respondents who gave their time generously and their insights candidly.

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PART I

THE DEVELOPMENT AND IMPLEMENTATION OF THE ESAA-NPO PROGRAM

by Jackie Kimbrough

SUMMARY

This research focused on the federal level implementation of the Non-Profit Organization (NPO) program, and explored the political context of NPO program development, the rationale for the community groups provision of the legislation, and the relationship between aspects of federal program implementation and local NPO operations. The research involved interviews with 50 respondents associated with the development and/or implementation of the Emergency School Aid Act (ESAA). Respondents included the staff of ESAA and its predecessor, the Emergency School Assistance Program (ESAP); Civil Rights activists; officials of the Department of Health, Education, and Welfare (HEW); and Congressmen actively involved in the passage of the legislation. The interviews, which were based on unstructured topic guides, were conducted during three week-long visits to Washington, D.C. The visits yielded the following information about the program's development and implementation.

HISTORY OF THE NPO PROGRAM

The ESAA-NPO program evolved from the Community Groups (CG) program of ESAA's predecessor, ESAP. During the late summer and early fall of 1970, a large number of school districts in the southern and southeastern states were hastily attempting to implement court-ordered and voluntary desegregation plans. Acknowledging the school districts' need for financial assistance during this transition period, President Nixon called on Congress to provide the necessary legislation and funding. In August 1970, Congress responded by appropriating $75 million to ESAP. Ninety percent of the funds were appropriated to local education agencies (LEAs) and 10 percent to Community Groups. ESAP was not a law, but rather, an emergency provision created under the statutory authority of six existing acts.

ESAP was implemented as an interim measure while Congress debated the Emergency School Aid legislation. The legislative debate was characterized by limited executive branch support for desegregation and considerable Congressional conflict over the program's goals. The major issues were whether ESAA should be a national program or a program for court-ordered southern districts; whether it should provide categorical

aid or general aid; and whether it should focus on compensatory education activities or activities to promote integrated education. Thus, ESAP was implemented in the context of mixed signals from Congress and the Nixon Administration regarding the extent to which desegregation goals were to be vigorously pursued.

ESAP's Community Groups provision was initiated by the Civil Rights coalition, an alliance of activist organizations involved in promoting southern school desegregation in the late 1960s and early 1970s. The coalition lobbied at the Department of Health, Education, and Welfare (HEW) for the inclusion of the community groups provision, arguing that in an era when southern LEAs resisted desegregation, community organizations demonstrated in favor of desegregation, helped draw desegregation plans, provided moral support for students attending desegregated schools, and monitored the local school boards' plan implementation. HEW officials acknowledged that the southern community groups in the early 1970s had performed a critical desegregation advocacy function that the schools, the state departments of education, and the courts were either unwilling or unable to do. Thus, the Community Groups program was based on the dual premises that a catalyst was needed to induce school districts to desegregate, and that certain desegregation-related activities could be more effectively performed by organizations external to the school district.

ESAP IMPLEMENTATION

Initial community group operations were influenced by both HEW's limited attention to the small Community Groups provision, and by LEA concerns that community organizations would infringe on the domain of the school districts. For example, the Community Groups program, which was administered separately from the LEA program, was understaffed and frequently unable to provide organizations with requested technical assistance. Furthermore, the Office of Education (OE) responded to the desegregation emergency by disbursing virtually all LEA funds by early fall 1970, while Community Groups funds were not disbursed until February 1971. The delay in disbursing Community Groups funds was due to administrative problems in the understaffed Community Groups office and

to conflict regarding whether SEAs and LEAs should be allowed to review community group proposals.

Some 150 community organizations in 14 southern and southeastern states were initially funded by ESAP. The Community Groups program was administered at the federal level by a small, predominantly black staff. Since the staff supported the notion of an autonomous Community Groups program, and since the regulations did not restrict community group activities or require cooperation with LEAs, the Community Groups program became primarily a desegregation advocacy effort. In many southern communities where LEAs continued to resist school desegregation, the advocacy activities of community groups generated conflict with the LEAs. This conflict resulted in LEA complaints to Congress about the independent and frequently adversarial activities of the federally funded community groups. Changes were subsequently made in the regulations and operations which limited the community group role in desegregation assistance.

The initial change occurred in 1971, when the Community Groups and LEA programs were consolidated into the newly created Bureau of Equal Educational Opportunity (BEEO). As part of BEEO's effort to make the desegregation assistance program more responsive to LEA concerns and priorities, a number of other changes were instituted. Revised regulations required that community group applications be accompanied by LEA comments; community groups were required to cooperate with the LEA and were prohibited from monitoring LEA plan implementation, and program officers began to encourage the groups to perform educational service activities. Civil rights groups and community organizations protested that these changes coopted community efforts to promote desegregation, but the changes remained in effect. Thus, by the time the ESAA legislation was passed, changes in community group activities and autonomy had been incorporated into regular BEEO program operations.

ESAA IMPLEMENTATION

In June 1972, the basic provisions of ESAP were enacted as the Emergency School Aid Act, with 8 percent of the $230 million average annual appropriation reserved for NPOs. The NPO program was implemented

by the Equal Educational Opportunities Program (EEOP) in a manner that restricts its role in facilitating desegregation. Restrictive aspects of program implementation include EEOP policy orientation, LEA-NPO relations, and authorized NPO activities.

EEOP Policy Orientation

Local school districts constitute EEOP's primary constituency. EEOP is staffed by program administrators, many of whom have prior experience as educators and share the educators' perspective. EEOP's concern for LEA priorities is reinforced by the fact that most ESAA funds are appropriated by law to LEAs. The NPO program, then, has no strong internal support and is implemented by administrators whose primary allegiance is to LEAs.

Perhaps the most critical aspect of EEOP's policy orientation is the lack of a desegregation advocacy focus in the program responsible for desegregation assistance. EEOP officials generally acknowledge that the function of the program is not to advocate desegregation, but rather, to make grant awards consistent with the statute. Thus, the single federal office responsible for desegregation assistance functions as merely an administrative and procedural entity.

This policy orientation also affects LEA-NPO relations.

LEA-NPO Relations

While the ESAA statute requires only that the NPO program complement and support the LEA plan, subsequent regulations and EEOP guidelines promote LEA dominance. For example, the regulations require the applicant NPO to provide the LEA with 15 days to review and comment on the NPO proposal. OE argues that the letters of comment provide evidence that the LEA is aware of proposed NPO activities. However, the majority of letters evaluated the need for the activities and the NPO's implementation plan. In effect, the NPO proposal is evaluated by the LEA as well as the review panel.

LEA dominance is also promoted by procedures requiring NPOs to seek and maintain cooperative relations with LEA; and by the four-member review panels that contain three educators and only one community representative.

The powerful position of LEAs, supported by the cumulative impact of the regulations, guidelines, and EEOP operations, limits NPO autonomy in addressing desegregation-related problems. For instance, case studies indicated that NPOs were less likely than non-ESAA groups to protest LEA policies, attributing their public silence to their perception that NPO funding depended on continued LEA goodwill and approval. Thus, the current OE policies result in the funding of NPOs that are less likely than other community groups in the same school district to be involved in citizen participation and desegregation advocacy. Case studies also indicated that the weak position of the NPO serves as a deterrent to many *bona fide* desegregation advocacy groups who would otherwise apply for NPO funding. In numerous districts, community organizations that used citizen action strategies to further desegregation goals chose not to apply for ESAA funding, contending that their legitimacy would be compromised by implicit requirements for LEA approval.

Authorized NPO Activities

While the law does not specify or disallow any particular NPO activities, the first three activities listed in the regulations provide for educational services. Educational service activities are also encouraged by both EEOP staff in pre-grant technical assistance meetings, and by local school officials in the joint needs assessment meetings. And while desegregation advocacy and monitoring activities are not prohibited by law, these activities are not encouraged by either the EEOP staff or by the LEAs during needs assessment sessions, nor are they listed as authorized activities in the regulations or on the application forms.

To the extent that EEOP and school district administrators promote educational services and fail to promote advocacy and desegregation-specific activities, the potential effectiveness of community organizations in promoting desegregation is limited. Case studies indicated that educational services have less impact on desegregation than advocacy, community relations, and other desegregation-specific activities. Further, community organizations are generally not exceptionally skilled or experienced in providing educational services, and the continued

emphasis on such activities is an inherent restriction on NPO effectiveness. Finally, since educational services are the domain of the LEA, such a program orientation serves to increase NPO dependence on school districts.

CONCLUSION

Procedures that restrict the NPO role in providing desegregation assistance reflect specific OE and EEOP policy concerns rather than the general strictures of the legislation. Thus, we recommend the following procedural and administrative changes. First, we suggest that procedures be developed to promote mutual LEA-NPO cooperation. We further suggest eliminating procedures that promote LEA dominance, and we encourage clarifying LEA/NPO roles and responsibilities. We recommend less emphasis on compensatory activities and more emphasis on advocacy and community relations activities. Finally, we recommend that the NPO program should be implemented by staff familiar with and sympathetic to community group concerns.

I. INTRODUCTION

The research reported here is part of a larger study designed to evaluate the effectiveness of the nonprofit organization (NPO) component of the Emergency School Aid Act (ESAA). A major focus of the larger study is NPO operations at the local level. Recent research on program implementation, however, suggests that it is unrealistic to attempt an effectiveness evaluation on the local level without attention to the policy issues and implementation processes at the federal level (Bardach, 1977; Berman, 1978; McLaughlin, 1974; Williams and Elmore, 1976). Thus, this aspect of the effectiveness evaluation examined how the intent of the NPO provision of the ESAA legislation was translated into an operational federal program.

Fieldwork at the local level indicated that NPOs engage in lower risk, lower impact activities (e.g., educational services, community relations) than other community groups in the same school district. Given considerable empirical evidence that community groups can be effectively involved in promoting school desegregation, it was important to determine whether desegregation policies and implementation processes at the federal level affected NPO effectiveness at the local level. Specifically, then, we were concerned with the political context in which the NPO program was developed; the rationale for the policy of community group involvement in local school desegregation efforts; and the federal level implementation of the NPO program.

These issues were investigated through review of record data as well as through interviews with respondents nominated as knowledgeable about the history, operations, administration, and implementation of the ESAA-NPO program.

A snowball sampling technique (Goodman, 1971) was used to generate the universe from which the interview sample was selected. As part of this technique, we developed an initial sample of eighteen people who were knowledgeable about the program; we then selected a random

sample of eight individuals as nominators. In a telephone interview,[1] each nominator identified several other people who were well informed about one or more of the following topics:

- Intent of ESAP[2]
- Intent of ESAA
- ESAP administration
- ESAA administration
- ESAP operations
- ESAA operations
- School desegregation policy
- OE implementation of desegregation policy

Each of the nominees also made nominations based on the categories described above. After the third iteration of the nomination procedure, we had generated a sampling universe of some 275 people.

A series of six matrices was then developed, using the following major issue areas as matrix factors:

- NPO program administration
- Federal school desegregation policy
- Desegregation policy implementation

Given the sizeable number of nominees, as well as the numerous issue areas, the matrices were designed as a means of minimizing the problems of noncoverage of information and of unnecessary duplication of information (Kish, 1967, pp. 408-409).

Using the Nominee Information Sheet (Appendix A), the names of individuals nominated by at least three different nominees were inserted in the matrices to reflect their areas of expertise. Potential respondents who were reportedly knowledgeable about the areas of concern were then randomly selected within the designated stratum.

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[1] Appendix A gives procedures for sample development.

[2] The Emergency School Assistance Program (ESAP) was an interim desegregation assistance measure implemented while ESAA was being debated in Congress.

The major problem with this procedure was the potential for obtaining a sample biased in favor of advocacy oriented desegregation assistance. In the purposive sampling, then, we made concerted efforts to obtain potential respondents with a range of views on this issue. Thus, the final sample included the following categories of respondents:

- Federal/regional staff of the Community Groups program of ESAP
- Principal federal staff of the current NPO program
- Advocates of the community groups provision in the initial legislation
- OCR staff in the three administrations during which the program has operated
- Domestic Council staff for educational issues
- Lawyers in the Civil Rights Division of the Department of Justice
- Staff of the Subcommittee on Education of the House Education and Labor Committee
- Staff of the Subcommittee on Education of the Senate Committee on Labor and Public Welfare
- Congressmen involved with ESAA legislation
- Civil rights interest groups
- Special Assistants to the Secretary of the Department of Health, Education, and Welfare (DHEW)
- Civil rights and education specialists in the Office of the General Counsel, DHEW
- Staff in the Office of the Deputy Assistant Secretary for Legislation (Education), DHEW
- Staff in the Office of the Assistant Secretary for Planning and Evaluation, DHEW

Data collection involved 50 interviews with the respondent sample generated by the procedures described above. The majority of the interviews were conducted during three one-week trips to Washington, D.C. The interviews were based on unstructured topic guides and

each took approximately one hour for completion. In addition to field interviews a major source of information was record data in the form of concept papers, memoranda, Congressional testimony, correspondence, and other records pertaining to federal level implementation of ESAP and ESAA.

The present report gives the results of this policy/programmatic analysis. Section II addresses the political context in which the desegregation assistance measure, ESAA, was proposed. The section further explores the program's intent from the perspectives of both the executive and legislative branches of government. Section III examines the rationale for the inclusion of community groups in the desegregation assistance legislation. In particular, this section explores the historical involvement of community groups in school desegregation, and the rationale for federally funded involvement from the perspective of both the Civil Rights coalition[1] and Office of Education policymakers. Section IV examines the federal level implementation of both the ESAA-NPO program and its predecessor, the ESAP Community Groups program, and contains conclusions and areas for policy recommendations.

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[1]The group referred to as the Civil Rights coalition consisted of several local, regional, and national organizations with a history of advocacy for civil rights. The coalition typically included, but was not limited to the American Friends Service Committee; Delta Ministry of the National Council of Churches; Lawyers Committee for Civil Rights Under Law; Lawyers Constitutional Defense Committee; NAACP Legal Defense and Educational Fund, Inc.; and the Washington Research Project.

II. POLITICAL CONTEXT OF EMERGENCY SCHOOL AID ENACTMENT

EXECUTIVE BRANCH INTENT

Any effort to explore the objectives of the NPO program must first address the broader issue of the objectives of the enabling legislation, the Emergency School Aid Act (ESAA). The Emergency School Aid story is deeply rooted in the school desegregation policies of the Johnson, Nixon, Ford, and Carter administrations. Paradoxically, this emergency desegregation assistance measure was the first educational policy initiative of President Nixon, whose administration has been widely described as weak in civil rights enforcement (Orfield, 1975b; Panetta, 1971; Wasby, D'Amato, and Metrailer, 1977). Thus, in examining the purposes of ESAA, it is important to first explore the historico-political context in which the legislation was introduced.

During the Johnson administration, freedom of choice was the principal strategy used by districts desegregating under HEW voluntary or court-ordered plans. The freedom of choice plans permitted a parent or child (14 years or older) to choose the school the child would attend in the coming year. In theory, these plans represented a major departure from the *de jure* segregation which required black and white children in the South to attend separate schools. In fact, despite their freedom of choice, virtually no white children chose to attend formerly black schools. The few black children who chose to attend formerly white schools did so at the risk of incurring harassment, physical harm, and economic reprisals by a hostile white community (Panetta, 1971; Wasby et al., 1977; U.S. Commission on Civil Rights (USCCR), 1975). During the four years that HEW freedom of choice plans were in effect, fewer than 25 percent of the students addressed by these plans ever attended school with students of a different race (USCCR, 1975).

The inadequacy of freedom of choice plans as a strategy for school desegregation was emphasized by the 1968 Supreme Court ruling in *Green* v *County School Board of New Kent County*. In their suit, the

black plaintiffs charged that the school board "had no intention of complying (with *Brown*) unless required" to desegregate, and that further, freedom of choice was "merely an impermissable expedient to evade (the board's) constitutional duty." The Supreme Court determined that the Virginia County's freedom of choice plan burdened the children and their parents with a responsibility that belonged to the school board. Finally, the Supreme Court required the school board to "...come forward with a plan that promises realistically to work, and promises realistically to work now..." (391, U.S.C. 430, 464, 1968).

This ruling reinforced the Johnson administration's earlier (March 1967) HEW position that terminal desegregation plans were to be implemented no later than the 1969-1970 school year. While the Supreme Court did not specifically prohibit freedom of choice plans, the *Green* decision prompted many school boards to abandon the plans because they would not result in immediate conversion to desegregated schools. Thus when President Nixon took office in January 1969, he inherited a myriad of southern school districts faced with implementing desegregation plans by the fall of 1969. Some 800 school districts faced the distasteful prospect of losing their federal funding if they did not meet the deadline. These impending Title VI[1] fund terminations seriously jeopardized the President's efforts to create a Republican majority in the South prior to the 1970 midterm Congressional elections. The success of this "Southern strategy" depended heavily on President Nixon's ability to fulfill his 1968 campaign promise to Southerners to drastically reverse civil rights policy and to oppose urban desegregation plans requiring busing (Orfield, 1975b; Panetta, 1971).

On July 3, 1969, Secretary Robert Finch of HEW, and Attorney General John Mitchell--the administration officials responsible for

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[1]Title VI of the Civil Rights Act of 1964 guarantees nondiscrimination in every program receiving federal financial assistance, and authorizes termination of federal funds for noncompliance.

civil rights policy and enforcement--issued a major policy statement on desegregation (*New York Times*, July 4, 1969). Widely interpreted as an executive branch retreat on school desegregation, the statement called for a delay in the scheduled fall implementation deadline. It further declared that the Department of Justice intended to use the lengthier and less effective litigation process rather than to continue with Title VI fund terminations to enforce compliance.

The administration's "slowing down" policy on desegregation enforcement became evident in the case of 33 Mississippi school districts under court order to desegregate by fall 1969. The HEW-developed plans were to be submitted to the U.S. District Court in August, ruled on by the first of September, and implemented in time for the opening of school. The plans were submitted in early August as required. Later in August, however, Secretary Finch wrote the judges of the Court of the Southern District of Mississippi, stating that "chaos and confusion" would reign if the submitted plans were implemented. Finch requested that the submitted plans be withdrawn, and that the deadline for filing new plans be extended to December. The Justice Department buttressed the HEW position by filing a motion to the same effect. In response to these requests, the Court of Appeals for the Fifth Circuit postponed the submission of new plans, and the thirty-three Mississippi districts continued to operate under the ineffective freedom of choice plans. The NAACP carried the case to the Supreme Court, and in *Alexander* v *Holmes*, the Supreme Court refused to accommodate further government delay in desegregating the schools. In a unanimous decision, the Court decreed that school boards are constitutionally mandated to desegregate first, and litigate later (396 U.S.C. 1218 (1969)).

According to Leon Panetta, a Director of the Office for Civil Rights (OCR) during the Nixon administration, the *Alexander* ruling convinced President Nixon that government delay tactics were of no avail, and that the nation had to proceed with desegregation. Thus, the President began to seek ways of desegregating the South without losing major Southern political support. During an era in which the administration was under fire for failing the segregationist constituency, the efforts to backtrack on desegregation policy aroused

the ire of the nation's liberals and moderates. Presidential adviser Patrick Moynihan then convinced the President to issue a strong policy statement on civil rights and school desegregation.

On March 24, 1970, the President made a major policy statement on elementary and secondary school desegregation. In his message, the President reaffirmed his "...personal belief that the 1954 decision of the Supreme Court in *Brown* v *Board of Education* was right in both constitutional and human terms" (Nixon, 1970a). After discussing the requirements of the law in terms of Court rulings, the President described the progress, problems, and complexities of current desegregation efforts. Finally, he proposed funding for "assisting school districts in meeting special problems incident to court-ordered desegregation," requesting $500 million for FY 1971 and $1 billion for FY 1972, a request that rivaled the Elementary and Secondary Education Act's FY 1972 appropriation. The Vice President's Cabinet Committee on School Desegregation and the Secretary of HEW were asked to develop funding criteria.

Two months later, HEW, with input from the Cabinet Committee, had drafted the Administration bill. The bill was designed

> ...to provide financial assistance to help school districts meet special problems incident to desegregation in elementary and secondary schools, and to improve education in racially impacted areas, and for other purposes.[1]

In his May 21, 1970 message to Congress, the President proposed this bill as the "Emergency School Aid Act of 1970." Stressing that by September more than 700 southern districts would desegregate, and another 500 northern districts would be under review for Title VI violations, the President urged immediate passage of this legislation. And, acknowledging the delay necessitated by the legislative process, President Nixon requested that funds be made available immediately

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[1]Message to Congress from the President of the United States, May 21, 1970.

through existing legislative authorities. Of the $500 million requested for fiscal 1971, $150 million was to be appropriated "on an emergency basis, as start up money."

In August 1970 Congress responded by appropriating $75 million for the Emergency School Assistance Program (ESAP), an interim measure implemented while the Administration bill was being debated in Congress. ESAP was not a law but rather an emergency provision created under the statutory authority and funding of six existing legislative acts.[1] Of the $75 million appropriated to ESAP, 90 percent was to go to local education agencies (LEAs) to cover the additional costs incident to desegregation, and 10 percent to community groups (CGs) to facilitate desegregation efforts.

The "emergency" was highlighted by the speed with which funds were made available to the LEAs. Within two days after the Congressional appropriation, OE personnel convened with eligible state and local school officials (Bell, 1971). Morgan and Mosher (1974) note that within four days ESAP regulations were published in the Federal Register, and a 36-hour approval deadline was placed on reviewers of LEA applications. The first grant to an LEA was awarded within 10 days of the Congressional appropriation, and within a month, one quarter of the funds had been distributed to the schools. Such was the haste to distribute the money to the schools that Jackson, Mississippi was notified of its $1.3 million grant award two days *before* HEW received the application. Virtually all of the money targeted to the LEAs was distributed within the thirteen southern and southeastern states before the November midterm Congressional elections. It was not until the following February that community group funds were disbursed.

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[1] The Educational Professions Development Act, Part D (20 U.S.C. 1119-1119a); the Cooperative Research Act (20 U.S.C. 331-332b); The Civil Rights Act of 1964; Title IV (42 U.S.C. 200c-200c9); the Elementary and Secondary Education Amendments of 1965, Sec. 807 (20 U.S.C. 887); the Elementary and Secondary Education Amendments of 1967, Sec. 402 (20 U.S.C. 1222); the Economic Opportunity Act of 1964, Title II (42 U.S.C. 2781-2837) (under authority delegated to the Secretary of Health, Education, and Welfare).

It has been charged that ESAA was not an executive branch effort to provide strong desegregation assistance but was instead an election year reward to southern districts that had to desegregate (Green, 1978; McPhee, 1971; Orfield, 1975b). The political reward theory is supported by the President's weak record in civil rights enforcement. In October 1970, some six months after the President's initial request for desegregation assistance funds, the U.S. Commission on Civil Rights issued a report critical of the administration's policy in school desegregation. As an agency of the executive branch, the USCCR further called on the President for leadership (USCCR, 1970). At about the same time, the black members of the House of Representatives formed a "shadow cabinet" (*Congressional Quarterly*, 1970) to oversee federal civil rights enforcement. The President's request for desegregation assistance funds clearly failed to convince civil rights advocates that the executive branch strongly supported school desegregation.

Further support for the reward theory was provided by the speed and timing of financial assistance to the LEAs. Finally, and perhaps most convincingly, while Congress was debating the bill to provide financial assistance to desegregating districts, administration officials were announcing the demise of southern school desegregation. In October 1970, for instance, HEW Secretary Richardson noted that 97 percent of the South's 2700 school districts had been desegregated. He further noted that the desegregated schools enrolled 90.5 percent of all black and white students in the South.[1] Patrick Moynihan reiterated that 90 percent of the southern students were desegregated, noting that "the great symbol of racial segregation is dismantled" (Gaston, 1971).

Reflecting the thoughts of many civil rights advocates, White House observer John Osborne (1971) noted

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[1] HEW *News Release*, 10-1970.

> The South's remaining segregated schools had to desegregate, the Supreme Court and the lower federal courts had made further delay impossible, and the Administration had no practical choice but to make the process as acceptable and rewarding as it could. Most of the requested $1.5 billion in special funds . . . is earmarked, Congress willing, for Southern school districts that are integrating now or have integrated in the past two years . . . the chief and declared objective is to reward while helping the white South in its enforced surrender to integration.

THE LEGISLATIVE DEBATE

The proposal of desegregation assistance legislation by a President with a limited commitment to school desegregation created an ambiguous political climate, such that groups with widely disparate views on desegregation felt they could shape the legislation to their own advantage. Thus, beset by supporters with incompatible goals, the desegregation assistance legislation wended a tortuous two-year course through Congress.

The two years prior to ESAA enactment were marked by several unusual events. Before the ESAA legislation was passed, some $150 million was spent on ESAP, the interim assistance measure. The legislative debate, then, was strongly influenced by the ESAP-LEA operations, which began three months into the hearings, and continued concurrently with the debate. Further, executive commitment to desegregation was so minimal that the President attempted to change the legislation to exclude public transportation, one of the most legitimate additional costs incurred by desegregating districts (Morgan and Mosher, 1974; Orfield, 1975a). Finally, the House passed the Administration bill (H.R. 17846) in December 1970, some seven months after it was introduced. Liberal senators, however, were so disenchanted with the looseness of the legislation that the Senate failed to pass the legislation in the 90th Congress. In January of the following year, Senators Mondale, Brooke, Kennedy, and others[1] sponsored competing legislation, the Quality Integrated Education Act (QIEA (S.683)).

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[1]Other Senate sponsors of the QIEA of 1971 included Senators Bagli, Case, Cranston, Gravel, Harris, Hatfield, Hughes, Humphrey, Inouye, McGovern, Montoya, Muskie, Randolf, Ribicoff, and Tunney.

When the House-Senate Conference Committee met in the spring of 1972, there were some 50 substantive differences in the House (the Administration bill) and Senate (the Mondale bill) versions of the desegregation assistance legislation (Fagan, 1973). While literally hundreds of issues were addressed during the hearings, the debate typically reflected the conflicting goals of categorical aid for integrated education on a national basis as opposed to general aid to southern court-ordered districts. The former position was generally espoused by liberal legislators, who were also interested in requiring tight eligibility standards for all applicant districts. The latter position was usually promoted by more conservative legislators. Despite the ultimate passage of the legislation, these two issues continued to influence the implementation of ESAP and ESAA. They are discussed in some detail below.

Targeting Funds to the South

The original draft of the legislation, which required minority students in southern states to be counted twice in computing state and national allocations, reflected the President's effort to provide funds to southern districts. While acknowledging that the double count provision favored the South, HEW Secretary Finch argued that the mechanism concentrated the funds in the areas of greatest need (Fagan, 1973, p. 83). He further noted that the provision "gives priority to the swift and successful completion of desegregation in *de jure* districts" (Finch, 1970). Thus despite Administration contentions that southern school desegregation was virtually complete (Richardson, 1970), the initial Administration bill reserved almost two-thirds of the earmarked funds for southern districts (Orfield, 1975b, p. 174).

Critics of the plan to target funds to the South included Congressmen who felt that the funds should be available to large urban districts in the East, North, and West, which were just beginning to feel the effect of court rulings on *de facto* segregation. Among the most vocal critics of the continued "Southern strategy" was Representative Hawkins of Los Angeles. Mr. Hawkins, along with the Civil Rights coalition, felt that the double count provision rewarded the very districts that

had resisted desegregation, while providing minimal support for districts that had attempted "good faith efforts."

Fagan (1973) notes that the double count provision was deleted from the House version of the bill and was never included in the Senate version. Yet despite the Administration's failure to get the double count provision enacted, the allocation formula as now implemented nevertheless favors the South.

Eligibility Requirements

One of the major concerns of the civil rights groups was that the looseness of the eligibility and monitoring criteria of the Administration bill increased the potential for misuse of funds by recalcitrant Southern districts. Although supporting the concept of federal desegregation assistance, Mrs. Marian Edelman of the Washington Research Project opposed the Administration bill during Senate hearings, noting that there was

> ...a lack of a defined goal ..., a lack of a well developed mechanism for review of project applications and disposal of money, the lack of an established monitoring system with tough sanctions, and the lack of an operational system of evaluation.[1]

Mrs. Edelman further argued that

> Minimal criteria should be drafted which would spell out which districts would be eligible for funds and which not, to insure that priority will be given to those districts who will use it best based on a decent effort toward desegregation and to discourage recalcitrant districts from submitting applications.[2]

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[1] U. S. Senate, *Hearings before the Subcommittee on Education of the Committee on Labor and Public Welfare*, 1970, p. 148.

[2] Ibid., p. 151.

Categorical versus General Aid

These concerns were later reflected in Senator Mondale's QIEA, which provided for categorical aid rather than for the general aid of the Administration bill. Fagan notes that the Mondale bill required a comprehensive district desegregation plan as the basis for eligibility. Further, specific sums of money were to be set aside for bilingual-bicultural programs, educational parks, and litigant fees in successful court suits. After deducting these setasides, the remainder of the funds were to be allocated to the states with some portion of each allocation to be spent on community group and pilot projects.

While Senator Mondale's proposed QIEA provided for categorical desegregation assistance, the Administration bill basically provided for general aid. Some money was reserved for discretionary use by the Secretary of HEW, but the remainder was allocated to states with no specific setasides. The Administration bill, whose eligibility standards assured that practically any district could be funded, favored maximum local autonomy in the spending of funds. The Civil Rights coalition concluded that "this act (the Administration bill) may well be a political sop for Southern school districts especially to spend freely however they desire."[1]

The fears of the civil rights groups were confirmed. A Civil Rights coalition evaluation of the first few months of the interim ESAP held that much of the LEA desegregation assistance money was used to perpetuate discrimination against black students and faculty.[2] Further, both the Civil Rights coalition evaluation and the Government Accounting Office (GAO) program audit confirmed that some funds designated for desegregation assistance were being used by local districts for general aid to education. Specifically, the GAO report noted that

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[1] Ibid., p. 150.

[2] American Friends Service Committee (AFSC) et al., *The Emergency School Assistance Program: An Evaluation*, November 1970.

> ...substantial amounts of grant funds were used for purposes that could result in aiding general education needs rather than in dealing with problems incident to the elimination of segregation and discrimination in the schools..., the implementation of these programs by school districts has resulted in directing the assistance to areas of general educational need rather than those stemming from the desegregation process.[1]

As a result of evaluations of the ESAP LEA program, Congress made efforts to strengthen the guidelines for LEA funding eligibility, the approved uses of money, and program monitoring. The general aid approach was not incorporated into the enacted compromise bill. However, the LEA use of desegregation assistance funds for general aid contributed to adversary relations with the community groups during the early days of ESAP.

Compensatory Education versus Human Relations

Another major issue that emerged during Congressional debate was the use of ESA assistance for compensatory education rather than for human relations. HEW staff members who worked on early drafts of the legislation recall that Secretary Richardson was specifically interested in providing a remedial reading and math program. A GAO program audit notes that remedial services were emphasized as authorized activities in both technical assistance meetings and in ESAA manuals.[2] Not surprisingly, the interim ESAP LEA program also showed a major compensatory education focus. Further, the Administration bill proposed extra funds for compensatory education in ghetto schools. Noting the potential conflict between human relations efforts and compensatory education efforts, the House Education Committee deleted from the Administration bill a separate category of eligibility for districts involved only in compensatory education. The Committee noted:

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[1]U.S. Comptroller General, *Need to Improve Policies and Proceedings for Approving Grants Under the Emergency School Assistance Program*, March 1976.

[2]U.S. Comptroller General, *Better Criteria Needed for Awarding Grants for School Desegregation*, January 1978.

> ...the existence of this category would also create much of a risk that integration would be avoided. The focus of this bill is on desegregation and integration and not on compensatory education....[1]

Despite legislative efforts to avoid the use of desegregation assistance funds for compensatory education, the initial compensatory focus was sustained throughout both ESAP and ESAA.[2]

Community Groups

As might be expected, most of the legislative debate focused on the 90 percent LEA provision rather than the 10 percent CG provision of the proposed desegregation assistance. A review of Congressional hearings documents during the period prior to the ESAA enactment indicates that the House engaged in very limited discussion of the CG provision, and the Senate engaged in virtually none.

The critical issue of community group relations with local school districts first emerged during a brief discussion of community groups in the House (1970).[3] While reviewing the draft of ESAP guidelines, Mr. Roman Pucinski questioned Professor James Coleman of Johns Hopkins University "...whether an outside agency...can be funded by HEW directly ... even though it has not been approved by the local school board." It had been noted earlier in the hearings that the draft guidelines required a project to be "clearly in support of the LEA plan." However, this requirement was not sufficient for Pucinski, who attributed the poverty program's failure in part to the "maximum feasible participation" of community residents. Pucinski continued to argue generally against community participation in education, and specifically against the lack of required LEA approval of community group applicants. Pucinski concluded that "what you are going to have is a lot

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[1] U.S. House of Representatives, *Hearings before the General Subcommittee on Education of the Committee on Education and Labor*, 1971, p. 15.

[2] U.S. Comptroller General, *Better Criteria Needed for Awarding Grants for School Desegregation*, January 1978.

[3] U.S. House of Representatives, *Hearings before the General Subcommittee on Education of the Committee on Education and Labor*, 1970, p. 130.

of private organizations moving into these local school systems and trying to take up the funciton of running these school systems."[1] Pucinski's comments apparently reflected the prevailing opinions of the southern education establishment, which felt that LEAs were charged with operating the schools and hence should have veto power over federally funded "outsiders" attempting to influence school policy and operations.

The Civil Rights coalition, which had conceived the notion of the community group provision, thought it a co-optation of the provision's intent to require approval from the very entities (LEAs) that had sought to circumvent desegregation. According to McPhee (1971, p. 35), the requirement of LEA approval meant that "the very community people who pressed for desegregation of the LEA in the first place...must seek the cooperation of those with whom their last contact was...in a court of law."

Later in the hearings Pucinski raised a second issue critical to LEA-CG relations. Although acknowledging that community groups were expected to facilitate desegregation by working "in support of the LEA plan," he noted that in many instances the desegregation plan was acceptable but the district's implementation of the plan was unacceptable. He did not follow this line of reasoning to its conclusion, but he was among the first to note the potential contradiction between a community group's support of the desegregation process and its support of the LEA plan.

Despite the significance of this distinction, as well as the political significance of the issue of LEA approval of community group proposals, both issues were ignored in favor of those more directly applicable to the 90 percent LEA provision. Thus the initial ESAP regulations and guidelines neither required LEA approval of community groups applications, nor specified an expectation of LEA-CG cooperative relations. However, as described in more detail in Secs. III and IV, community group-school district relations were to become

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[1] Ibid.

a critical issue in the implementation of the community groups program.

Summary

The community groups provision of the emergency desegregation assistance program was enacted in the political context of limited executive branch support for school desegregation, and Congressional conflict regarding the intent of the legislation. Further, the ESAP program was characterized by a rush to implement the LEA component, and it limited attention to the CG component. The effect of these factors on the implementation of the community groups program is discussed in Sec. IV. First, however, the rationale for the community groups provision is presented in Sec. III.

III. COMMUNITY GROUPS: THE POLICY IDEA

THE THEORETICAL PERSPECTIVE

There is considerable theoretical and empirical support for the notion that community groups can be effectively involved in assisting desegregation. The potential community group involvement in a district's desegregation effort is perhaps best understood in relationship to the district's desegregation stage or phase. Figure 1 schematically represents a desegregation phase model based on the stage theory formulations of Chesler et al. (1974), Mercer et al. (1973), and Smith et al. (1973), as well as on desegregation case studies. The model conceptually orders the major events/phases involved in the process of desegregating a school district.[1] The four phases--segregation, planning, implementation, and outcome--represent common elements across a multitude of school districts responding to desegregation initiatives. We use this model, then, to present theoretical support for and empirical evidence of the community group's role in facilitating desegregation throughout the desegregation process.

Segregation Phase

This phase refers to situations where school districts are segregated and have not been ordered to desegregate, or have decided not to voluntarily desegregate. The segregation phase has two major focuses: static segregation and the creation of issues. Both are characterized by *de jure* and *de facto* desegregation, and by the absence of an authoritative desegregation decision. However, static segregation is relatively unchanging, while the creation of issues is characterized by local efforts to change the district's segregated status.

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[1]The discussion of desegregation stages or phases is presented only as an explanatory tool to better understand community group activities. For a more detailed discussion and critique of the desegregation phases formulation, see Crocker et al. (1977).

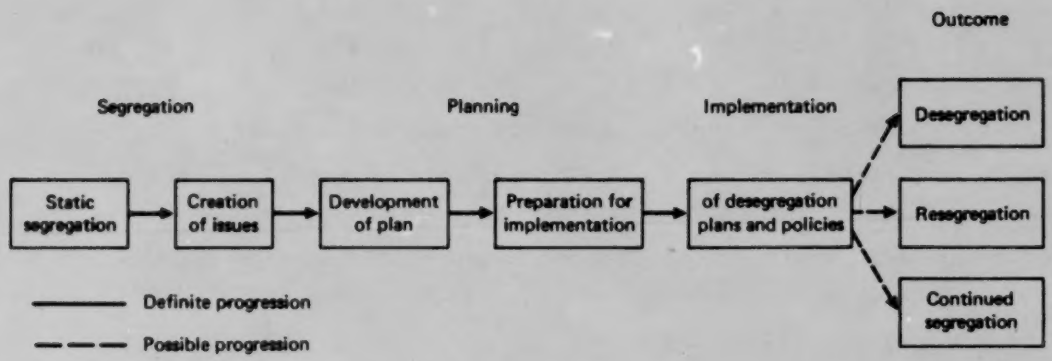

Fig. 1--Process Model of School Desegregation Phases

Static Segregation. Static segregation, or undisturbed segregation (Orfield, 1977, private communication), exists before desegregation is raised as a critical community issue. This phase is often characterized by a "there's nothing to be done" attitude on the part of school administrators and by a lack of publicly visible efforts by the community, the district, or the government to bring about desegregation. Currently, static segregation probably exists to a greater extent in non-southern districts (Kluger, 1976) where administrators fail to acknowledge the inevitability of desegregation in *de facto* segregated districts.

Static segregation is also evident in the contemporary version of *de jure* segregated districts which, with legal sanction, serve single-ethnic groups (Mercer et al., 1973). In most instances of this type, city suburbs are divided into a "patchwork of socially/racially homogeneous school districts where the district boundaries themselves are a barrier to interracial education" (p. 14). In such *de jure* segregated districts, school officials often contend that

due to demographic constraints desegregation is not possible. Thus, the defining characteristic of static segregation is the lack of visible movement toward altering the segregated status.

Because of the limited potential for change during static segregation, the literature suggests that community organizations have virtually no impact on the elimination of segregation/racial isolation during this phase.

Issue Creation. In contrast to static segregation, the creation of issues phase is characterized by visible efforts on the part of the district, community, and federal government to initiate school desegregation. Specifically, mass meetings to discuss the need for change, as well as local media coverage regarding the desegregation issue, occur in this phase. Orfield (private communication, 1977) comments that a crucial role for community organizations is the creation of a public issue around the need to desegregate. He also notes that community organizations have played a key role in triggering federal intervention by filing complaints or lawsuits, or by serving as information sources to official investigations. In summary, where there are publicly visible and acknowledged efforts to change the district's segregated status, a community organization often has a desegregation related impact by addressing the following issues:

- o Increasing the community's information level regarding segregation/desegregation.
- o Building support for desegregation and desegregated public education.
- o Providing the litigant with background information regarding the case.
- o Providing the litigants or plaintiffs for the case.

Planning Phase

The planning phase occurs while the school district is still segregated, and the school district/community and/or courts are involved in working out the mechanics of an adopted desegregation plan. Smith et al. (1973) contend that "the planning phase begins as soon

as a school district has decided to desegregate, either voluntarily or under court order" (p. 13). This stage, as a formalized entity, continues until the schools first open on a desegregated basis. Within this time frame are two critical functions: development of the plans and preparation for implementation.

Development of the Plan. Formal efforts to develop a desegregation plan begin after the decision to desegregate is made and continue until the plan is adopted by the school board and courts. Case studies of school desegregation in various cities (Crain, 1968; USOE, 1969; USCCR, 1972, 1973, 1976) indicate that during this period, school district administrators and, optimally, residents of the district are engaged in adapting a national desegregation mandate to the constraints of the local context.

To this end, community organizations can play an important role during the development of the plan. At the most basic level, case studies indicate they can serve as a communications link between the school district and the community. Specifically, they can disseminate information to the community regarding issues such as the progress of any litigation, the status of desegregation efforts in other communities, and effectiveness of various desegregation strategies. Rumor control activities can also be a critical aspect of the communications link, as well informed and credible community organizations provide veridical feedback on potentially explosive issues (USCCR, 1972).

Community organizations can also be involved in generating support for the principle of desegregation and for the desegregation plan. Case studies (USCCR, 1972, 1976) indicate that civic groups such as the League of Women Voters and the Junior League are often effective advocates for desegregation and for the desegregation plan among the business elite, the school administration, and the media. Neighborhood community action groups and national human rights groups have also been found to generate desegregation and plan support among their constituencies. This support-generating function has been found to be especially critical in *de facto* segregated districts

where it is difficult to prove that the segregated schools are, in fact, illegal (Mercer et al., 1973; Kluger, 1976).

Perhaps the most difficult and ultimately the most critical role of the community organization during this phase is its contribution to the actual desegregation plan and policies. Research on planned change (Goodlad et al., 1970; Schon, 1971; Wargo et al., 1972) stresses the tendencies of school districts, when implementing education innovations, to regress to previous or only marginally different patterns of behavior. Given the racist attitudes and fear of change that often accompany efforts to desegregate, it is easily understood how these regressive tendencies are exacerbated. Thus, it becomes a critical task for the community organization to insure that the plan is as sensitive and comprehensive as possible, and that written policies sensibly express district policy on potentially divisive issues.

For instance, many school districts have experienced severe disruptions years after the plan was implemented, when minorities realized that their neighborhood schools were closed; that their children were more frequently bused; that they were being tracked, or otherwise segregated; that they were often denied the opportunity to participate fully in extracurricular activities; that they, in effect, bore the burden of school desegregation. The efforts of community organizations in insuring that such issues are addressed before the plan is adopted may well reduce the likelihood of later disenchantment with the plan. Similarly, research by Epps (1971) indicates that in communities characterized by a notable lack of sensitivity to racial issues, community organizations have influenced policy decisions and urged written statements on issues such as student discipline, dress and grooming codes, pupil assignment, ethnic classroom materials, assignment and displacement of personnel, location of new facilities, the closing of schools, and the modification of school identities to reflect consolidation.

In summary, during the development of the plan, community organizations have been found to facilitate desegregation by providing the following functions:

- o Serving as a communications link.
- o Building support for desegregation and for the plan.
- o Providing information relevant to litigation.
- o Providing input to the plan and desegregation related policies.

Preparation for Implementation. Between the time that the plan is adopted and the plan is implemented in the schools, the district is typically involved in preparation for the opening of the schools on a desegregated basis (Smith, 1973; USCCR, 1973, 1976). During this time, the communications and advocacy functions of the earlier planning phase become even more critical. Case studies of desegregating communities indicate that community organizations continue to play an important role by informing residents about features of the plan, specific school openings and closings, etc. Similarly, generating support for the plan among both the city's business and civic leaders, as well as the residents, looms more important as implementation approaches. In addition to building support during this phase, a more directed function of many community groups has been to actually solicit community involvement in the preparation for desegregation. In one mid-southern city, for instance, groups of white and black parents near receiver schools set up "hospitality" committees to meet and welcome parents and children who would be bused into their communities. In other cities (Smith, 1973), community involvement was generated by getting parents to volunteer as classroom aides, by participating in community human relations forums, and by conducting home-based desegregation discussion sessions.

Smith (1973) notes that many of the activities, practices, and attitudes of the segregated schools/staff are carried over into the desegregated schools, inhibiting the effectiveness of desegregation. To guard against this, community organizations can make a critical though difficult contribution to the preparatory activities and development of the transition guidelines. They can provide input to and monitor the development and distribution of a modified curriculum, the training and reassignment of teachers and administrators, and the

reassignment and transportation of students. Community groups can play a similar role in developing transition guidelines and policies, especially for such sensitive issues as administrative and staff support for desegregation, student discipline, and behavior codes, expenditures for schools, ability grouping, student transfer, and school identity.

In summary, the literature indicates that during the preparation for implementation, community organizations help promote the desegregation process by

- o Serving as a communiations link.
- o Building support.
- o Soliciting community participation.
- o Providing input to preparatory activities.
- o Providing input to transition guidelines.

Implementation Phase

The implementation phase begins when the schools in the district first open on a desegregated basis, and continues until all major features of the plan have been introduced into the schools. Recent investigations (Orfield, 1975a; USCCR, 1976) note that most of the anxieties and attention of the long desegregation process are focused on this phase, as students, teachers, administrators, and parents first encounter the reality of desegregation. This encounter has been shown to be affected by the prior characteristics of the plan and the planning process, as well as by the actions of district personnel, students, and community at the time of implementation (Mercer, 1973; Smith, 1973).

During this phase, the district implements the mechanics of the plan and related policies and guidelines (Smith, 1973). At a minimum, the phase is characterized by student and teacher reassignment. In many districts this phase also involves the initial adaptation of prior school policies and practices to the newly desegregated circumstances. For instance, districts may begin to put into practice newly devised policies dealing with curriculum, administrative strategies,

teacher training, and revised curriculum and teacher techniques (Berman and McLaughlin, 1974; Smith, 1973).

Whether the district is implementing new policies or merely continuing old ones, case studies have shown that the manner in which the policies are implemented has implications for the quality of interaction within the school. Critical issues include the schools' handling of student transfers, extracurricular activities, student discipline, and teacher-student interactions. Similarly, Smith (1973) has found the creation of a new school identity that reflects the various ethnicities and cultures to be a critical determinant of the quality of desegregation. Thus, in an immediate sense, the management of these issues makes the difference between a crisis-ridden implementation phase and a more tranquil implementation phase. And in the long run, the handling of these issues is critical because the early interactions may well establish a pattern for future racial interaction and problem resolution in the district.

During this phase, community organizations can play an important role addressing issues at the school operations level. Although community groups cannot make policy, they can monitor the implementation of policy (e.g., transfers, disciplinary actions) to gauge its impact and provide feedback to the district about the need for policy revision. Similarly, although community groups are not likely to develop curriculum or conduct teacher training sessions, they can provide critical and sensitive input into these tasks.

Perhaps the most typical role of community groups during implementation has been that of crisis management. In some districts, community organizations have served as mediators of racial disputes and as spokesmen for minority parents who felt their children were being unfairly treated. As part of their crisis management role, community groups have also established rumor control centers and information dissemination networks.

Within the community at large, community organizations have been found to serve a useful role during this phase by improving communications, maintaining support for the plan, generating parent participation in the schools, or in school related activities, by

encouraging parent leadership and promoting positive human relations among adults of various ethnic and political backbrounds (Smith, 1973; USCCR, 1973, 1976). Working with students outside the schools, community organizations have provided the much needed function of explaining the reasons for desegregation, and the nature of the institutional struggle in an effort to reinforce minority students' feelings of group identity and self-awareness (Snowden, 1976, personal communication).

In summary, the literature indicates that during implementation community organizations facilitate the desegregation process by

- o Maintaining community support for desegregation and for the plan.
- o Encouraging parent participation and interaction.
- o Assisting in the resolution of implementation related crises.
- o Monitoring implementation of the plan and its policy provisions.
- o Developing student support for and understanding of desegregation and their role in that process.

Outcome Phase

This phase begins after all plan features have been implemented in the district, and continues as the district adapts to the changes brought about by the decision to desegregate. Although the implementation phase of the desegregation process receives the most attention, both Orfield (1975a) and Smith (1973) suggest that the continuing phases of desegregation are perhaps more critical in determining the long-range quality of the desegregation effort. Specifically, Smith notes that continued planning and input past the implementation stage are critical to the long-term success of the desegregation. Similarly, Orfield argues that the practice of focusing attention and money primarily on the preimplementation and current implementation districts is shortsighted. According to Orfield, postimplementation districts are constantly changing and adapting, and only constant surveillance and modification of the district plan and policies will make the postimplementation desegregation process work.

Some recent research supports Orfield's views, indicating that desegregation related problems do not end after the initial implementation phase is complete. Instead, some districts remain segregated, despite the implementation of the plans (USCCR, 1972). In other districts, inept and insensitive administrative policies and practices have resulted in a multitude of "second generation" problems among minority students, thereby increasing the level of race related tension and hostility in the desegregated schools (Epps, 1971; Orfield, 1975a; Smith, 1973). And in still other districts, parent anxieties about the effect of desegregation, coupled with real and continuing crises in the desegregated schools, contribute to the resegregation of the schools shortly after the completion of initial implementation (Chesler et al., 1974; Mercer et al. 1973, Weidman, 1975; Weinberg, 1976). The functions of community groups in facilitating desegregation in each of these outcome phases are described below.

Desegregation. For our research purposes, desegregation does not refer to the quality of education or interaction in the schools, but simply refers to whether the minority/majority ratio of students within a district's school reflects the ratio of the community at large. If desegregation viewed as an innovation works like other education innovations, the desegregation policies should be incorporated into overall school policy (see Berman et al., 1975). However, given the tendencies of school districts to revert to the status quo, case studies indicate that community organizations should monitor previous accomplishments and remain alert to practices and policies that might foster resegregation. On the school operations level, the community organization might well address itself to "second generation" problems such as ability grouping and racially identifiable classrooms (Mills and Bryan, 1976), disproportionate minority suspensions and expulsions (Yodof, 1975), and the exclusion of minority children from extracurriculur activities (USCCR, 1976). Or the community organization might keep abreast of the achievement levels of students in the schools, and the proportion of students accepted into college.

Epps (1971) and Martin (1977, personal communication) both contend that administrative policies and school board decisions are

also critical determinants of the future of desegregated schools. On the basis of these contentions, then, community organizations can keep informed (and keep the community informed) about issues like resource allocations to various schools, the construction of new facilities and the closing of old facilities, proposed changes in district boundaries which might affect district desegregation status, policies for transferring out of desegregated schools, etc. By closely monitoring administrative policy decisions, by keeping the concerned communities well informed, and by continuing to build support for desegregation, it may be possible for community groups to stymie massive resegregation.

In summary, the literature suggests that community groups can facilitate continued desegregation by providing the following functions:

- o Addressing second generation problems in school operations.
- o Monitoring and influencing administrative decisions that affect parent choice regarding public schools.
- o Maintaining community support for desegregated public schools.

Resegregation/Continued Segregation. After a district has resegregated (or has continued its segregated status--e.g., the majority/minority student ratio in most schools does not reflect the community's majority/minority ratio), there may realistically be very little that community organizations can do to reverse the situation. If the parents reside in the district, but send the children to private schools, community groups may try to generate public support for the public schools. Or, as was done in Memphis and other cities (USCCR, 1976), the school boards could be persuaded to upgrade school services and quality and establish magnet or optional schools, in an attempt to entice white students back into the public school system.

If the resegregation or continued segregation results from residential flight to the suburbs, community groups cannot reverse the

situation except perhaps through litigation for metropolitan desegregation. In summary, case studies of resegregating communities suggest that community groups have minimal impact on desegregation during this phase.

INTENT OF THE COMMUNITY GROUPS PROVISION

The inclusion of the community groups provision in the Emergency School Aid legislation is usually attributed to two factors: the traditional resistance of southern school districts to judicial integration mandates, and the historical role community groups played in promoting southern school desegregation. LEA defiance of Constitutional integration initiatives has been well chronicled. Since 1954, segregationists have invoked "state's rights," "separate but equal schools," "freedom of choice," and "sanctity of neighborhood schools" in an attempt to maintain segregated educational facilities (Wasby et al., 1977).

During this period, many parent and community groups were actively involved in advocating desegregated schools. McPhee (1971) noted that in an era when southern school boards had been resolutely resisting integration, community organizations

> had been working on problems related to school desegregation for years, bringing the critical legal issues to the courts, supporting students who first crossed racial lines, organizing parents and community leaders into discussion groups, and monitoring the actions of local school boards and officials as well as public policy.

Other participants in this activist era (Brader, 1978; Green, 1978; Mizell, 1978) note that the organizations demonstrated in favor of school desegregation, helped draw desegregation plans, publicized desegregation related activities of local school boards, filed redistricting suits to gain minority representation on school boards, and supported integrationist candidates for public office.

Because of their active support of desegregation, the parent and community groups frequently provoked the ire of local businessmen, the

educational establishment, and other residents opposed to school desegregation. In many instances, community organization advocates of desegregation were harassed by the local power structure (Kluger, 1976; Wasby et al., 1977). For example, some southern states revoked the charters and corporate status of groups engaged in desegregation advocacy activities. Parents and other private citizens who pressed for desegregation were frequently threatened with loss of employment and physical harm. Thus, in many southern communities which continued to resist federal desegregation mandates, adversary relations developed between the desegregation advocates and the desegregation opponents, which typically included the LEA.

The desegregation advocacy activities of these local organizations caught the attention of the Civil Rights coalition, which had also been involved in similar desegregation support activities. Thus, when the HEW officials drafting the administration bill called for input from various interest groups, the Civil Rights coalition convinced HEW of the importance of community group funding. Basically, recalled Winifred Green of the American Friends Service Committee, "We wanted to give financial resources to people who for years had tried to solve the segregation problem, rather than give it only to the people who for years had continued to create the problem."[1] Thus, according to the coalition, the groups to be funded were parent groups and other community organizations that had been legitimate advocates for desegregation in their communities. Concurring with this position, Office for Civil Rights Director Stan Pottinger noted in his 1970 testimony before the House, "We are interested in funding groups who have had experience in desegregation, ...groups whose *bona fide* desegregation credentials are not questionable."[2]

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[1]Interview with Winifred Green, Santa Monica, California, September 1976.

[2]U.S. House of Representatives, *Hearings before the General Subcommittee on Education of the Committee on Education and Labor*, 1970, p. 166.

Arguing that community groups performed a critical and often ignored task in desegregating communities, Marian Edelman of the Washington Research Project[1] urged

> ...that private nonprofit groups be allowed funding under this act. In 1964 when the Jackson, Mississippi, schools were beginning desegregation we would not have really made it in large part without violence or with continuing white or black support of the public schools had it not been for a large group of white mothers who started a movement to support the schools and keep the schools open and provided the community with information and provided talks in the local communities and tried to tell black parents and white parents that their fears were in large part unfounded ...
>
> There are also many many black groups working in the school desegregation area that ought to be supported... many of them know now better than the Office of Education how federal programs are working at the local level because they study and pay attention to what the school districts are doing. I think they should have a role in how federal money is being spent and in deciding what is going to be done at the community level and in monitoring and evaluating local school district programs.[2]

Thus the basic intent of the community groups provision, as espoused by those who proposed the program, was to fund parent groups and community organizations to continue their support of the school desegregation process. Although no list of acceptable community group activities was generated, one of the influential drafters of the legislation recalled that the "community groups were designed to be in support of the desegregation process, just as they were prior to the funding." According to community group proponents Barber, Edelman, and Green, parent and community groups were expected to continue to advocate for integrated public education, to provide a support system (e.g., educational assistance, emotional support, etc.) for parents and children in the integrated schools, to monitor the

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[1]The Washington Research Project is part of the loosely structured group referred to here as the Civil Rights coalition.

[2]U.S. Senate, *Hearings before the Subcommittee on Education of the Committee on Labor and Public Welfare*, 1970, pp. 158-159.

fidelity of LEA plan implementation, and to disseminate accurate information about the plan and its implementation.

While the Civil Rights coalition initiated the provision, highly placed HEW officials acknowledge that the community groups provision provided a natural point of convergence for the interests of both the coalition and HEW. In the summer of 1970, HEW was concerned "to enhance the Administration's credibility on civil rights and desegregation to ensure passage of the Emergency School Aid Act of 1970 with a minimum of statutory restrictions."[1] To this end, it was essential that desegregation plans be implemented as peacefully as possible. Officials in OCR recall that many communities, disgruntled with the orders to virtually desegregate overnight, threatened, even promised, violence. Such violence was expected to harden the Southern position that massive desegregation could not be accomplished within the court-ordered time limit, an event that would place the President in a politically untenable position in the eyes of both the conservative and liberal constituencies.

HEW, through its Title IV[2] programs, had done considerable desegregation related work in the South, and was somewhat familiar with the work of many of the parent and other community groups. Thus the notion of mobilizing these black and white groups to calm the fears of parents, squelch destructive rumors, and support desegregated public education was appealing. Jerry Brader, director of OE's Division of Equal Opportunity (DEEO) during 1970, acknowledged that community groups in the South had been performing a critical desegregation advocacy function that the schools, the state departments of education, the courts, and the Title IV programs were neither willing nor able to do.[3] Further,

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[1] HEW, Office of the Secretary, Briefing Paper on the $150 Million ESAP, July 1970.

[2] Title IV of the Civil Rights Act authorizes the U.S. Office of Education to provide technical assistance and training services to school districts to meet the special needs of implementing a school desegregation plan or operating a desegregated school system.

[3] Interview with Jerry Brader, April 1978.

while acknowledging some possible disadvantages of the community groups provision, a policy memorandum from the Office of the Secretary cited the advantages as including

- o The ability (of community groups) to bring resources directly to bear on crises caused by the desegregation process.
- o The absolute necessity of having strong community involvement in and support of the implementation of desegregation plans.
- o The strong support for this provision being given by the civil rights leaders consulting with the House and Senate committees on the ESAA of 1970.[1]

Thus, both the Civil Rights advocates and HEW saw the funding of community groups as being in their respective best interests.

Despite the initial support for the community groups provision, problematic issues inherent in the policy idea ultimately threatened program implementation. According to McPhee (1971), the critical decision to fund community groups marked the government's first official problem solving. At a minimum, some problems were to be expected in terms of the LEA's perception of community group intrusion into their educational domain. Indeed, in anticipation of this issue, the Office of the Secretary of HEW acknowledged that

> ...the education establishment is traditionally opposed to education services being provided by others, especially community organizations.[2]

Further problems were inherent in the notion that community groups, who had actively advocated for desegregation and were frequently at odds with the local school boards, were expected to facilitate the LEA's implementation of the plan.

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[1]HEW, Office of the Secretary, Briefing Paper on the $150 Million ESAP, July 1970.

[2]HEW, Office of the Secretary, Briefing Paper on the $150 Million ESAP, July 1970.

Perhaps the most critical problem with the policy idea is the contradiction inherent in the charges to "facilitate the desegregation process" and to "support the implementation of the plan." The former phrase was typically used by both HEW officials and the Civil Rights coalition to describe the task of the community groups. However, the initial guidelines--and all subsequent guidelines, regulations, and the law--described community groups as supporting the implementation of the plan. The two task orientations have significantly different implications for community group operations, dependent on the LEA's support of desegregation and fidelity to the plan. For instance, in districts where there is maximum LEA support for desegregation and fidelity to the plan, working in support of the desegregation process and working in support of implementation of the plan may be identical tasks. However, when the LEA resists desegregation or does not show good faith compliance with the plan (the condition which the community groups provision was designed to address), support of the process and support of plan implementation may become contradictory tasks. Thus, in recalcitrant districts, community groups were left with the option of supporting LEA plan implementation, and not supporting the desegregation process, or of supporting the process and risking the development of adversary relations with the LEA. With either option, the potential for NPO effectiveness would be severely compromised.

IV. PROGRAM IMPLEMENTATION

The Emergency School Aid Program (ESAP), the interim response by Congress to the President's urgent request for desegregation assistance funds, was designed

> ...to meet the special needs incident to the elimination of racial segregation and discrimination among students and faculty in elementary and secondary schools by contributing to the costs of new or expanded activities to be carried out by the local educational agencies or other agencies, organizations or institutions...[1]

Funds for this provision were appropriated in August 1970, with 10 percent of the $75 million designated for the Community Groups program. ESAP was implemented during the 28-month period prior to the enactment and appropriation of ESAA funds.

As noted in Sec. II, the period prior to and during the ESAA legislative debate was characterized by minimal White House support for desegregation and Congressional conflict regarding the intent of the proposed legislation. Thus the ESAP Community Groups program was initially implemented in the context of mixed signals from the legislative and executive branches regarding the extent to which desegregation goals were to be actively pursued.

ESAP COMMUNITY GROUPS PROGRAM ADMINISTRATION

The early implementation of the Community Groups program was affected by the fact that many of the principal actors in the Office of Education (OE) shied away from this potentially controversial program, treating it as a distant relation to ESAP's LEA program. Staff members of the initial Community Groups program and HEW Secretary Richardson's staff recall OE's concern that the potential explosiveness of the desegregation efforts in the South would be

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[1] 45 C.F.R., Sec. 181.2, August 14, 1970.

exacerbated by federal funding of Community Groups. Thus, in part because OE wanted to retain its credibility among its southern school superintendent constituency, and in part because regional and national officials were unsympathetic to the community groups provision (McPhee, 1971), the administration of ESAP Community Groups was separated from that of ESAP LEAs.

Thus, in the fall of 1970, Commissioner of Education Sidney Marland delegated the responsibility for developing operational guidelines to the Center for Community Planning in the Office of the Secretary of HEW, rather than to the staff of OE, which developed LEA guidelines. McPhee described the Center for Community Planning as "...generally friendly to the concept of the (Community Groups) program, but inexperienced in funding administration and unfamiliar with the broad process of school desegregation (p. 2)." The Center was located across the street from the ESAP-LEA office in OE, which heightened the separate identities of the ESAP-LEA and Community Groups programs.

Both the Community Groups and LEA programs were operated from OE. The LEA program was administered through the Division of Equal Educational Opportunity (DEEO) with the director of the LEA program reporting to the director of DEEO. However, the director of the Community Groups ESAP program reported directly to the Associate Commissioner of Education, Terrell Bell. Thus, in a departure from traditional practice, the Community Groups program was essentially administered through the Office of the Commissioner of Education. Observers of that era speculate that the program was administered from the Commissioner's Office because it was both political and potentially controversial, a hypothesis supported by Community Groups staff claims that daily reports on funded projects were sent directly to the White House.

The separate administration of the Community Groups and LEA programs was accompanied by separate staffing. McPhee (1971) and Kirschner (1972) both report that the Community Groups Office was severely understaffed. Melvin Johnson, the director, recalled the difficulties in obtaining adequate staffing, noting that the staff never exceeded five full time people. Further, unlike the LEA program, the Community Groups program was administered by people who

were outside and hence unfamiliar with the OE hierarchy. Thus, while the staff and director of the Community Groups program supported the intent of the provision, they reportedly lacked the administrative experience with OE which was necessary to manage such a politically sensitive program.

In contrast to the LEA program, the initial staff of the Community Groups program was predominantly black. At the federal level, the director and two of the three program officers were black. At the regional office level, the Dallas and Atlanta Community Groups programs were headed by two minority men--one black and one Hispanic. The staff of both programs was at least 50 percent black. Staff of the original Community Groups program contend that, given the strong black presence in the program, both the public and LEA personnel tended to view the Community Groups program as a "black program." And, since many of the southern community organization litigants were black, black predominance in the Community Groups program increased the apprehension of many LEAs.

The Office of Education's limited attention to the Community Groups program led to delays in funding the applicant community organizations. It was not until October 1970 that the OE Community Groups Office sponsored conferences in Dallas and Atlanta to solicit proposals from community organizations. McPhee (1971) notes that these community group conferences took place only after a significant proportion of LEA applicants had been funded.

In a statement to the Senate Subcommittee on Education (February 1971), Ruby Martin of the Washington Research Project noted

> In sharp contrast to the hasty and haphazard way in which grants for school districts were approved, the...community groups (provision)...has been virtually ignored. As of today, nearly six months after the opening of school, not a single grant has been announced under 10% set aside for community groups under ESAP.[1]

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[1]U.S. Senate, *Hearings before the Subcommittee on Education of the Committee on Labor and Public Welfare*, 1971, p. 137.

According to McPhee, the delay was largely due to the unresolved issue of who, in addition to the OE staff, should review the Community Groups proposal. In response to LEA concerns about autonomous Community Groups, the State Advisory Committees on School Desegregation,[1] and the SEAs and LEAs in several states claimed the right to review Community Groups proposals. While there was no provision for such a review in the regulations, the statutory authority that was the basis of the Community Groups program (Office of Economic Opportunity Legislation) did allow gubernatorial veto. In some states, the requirement for gubernatorial approval apparently served as a proxy for LEA approval. In Mississippi, for instance, Governor John Williams declined to approve eleven of fifteen community organization applications, commenting that

> local school administrators and concerned citizens have been consulted concerning these (Community Group) programs, and the opinion is that they will in no way complement nor work in conjunction with existing school programs. In fact, in most instances, the proposed activities of these groups would be detrimental to present operations. This money could be much more effectively used if it was given to local school authorities to be used for the advancement of existing programs.[2]

Voicing his criticisms much more succinctly, Alabama Governor George Wallace vetoed all twelve Community Groups proposals, noting that

> These projects do not have the approval of the local boards of education, the State Board of Education, nor a majority of the people in the various communities to be affected.[3]

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[1] In 1970, President Nixon began to appoint state Advisory Committees on School Desegregation to allow for local involvement in school desegregation planning.

[2] Correspondence from John B. Williams, Governor of Mississippi, to C. J. Martin, Regional Commissioner, Department of Health, Education, and Welfare, Atlanta, Georgia, 1971.

[3] Correspondence from George C. Wallace, Governor of Alabama, to HEW, 1971.

Ultimately, the Secretary of HEW overrode some of the gubernatorial vetoes in each of these Southern states, resulting in a considerably higher proportion of funded community groups than would otherwise have been possible. However, despite a November 1970 deadline for community group applications, the initial funds were not disbursed until March 1971, and many applicants were not funded until May 1971.

In summary, both the mixed signals from the executive and legislative branches regarding the extent to which desegregation goals were to be pursued, and the problems involved in initially administering the program, had a strong impact on subsequent program operations. For instance, while the separate administration of community groups was initially viewed quite negatively by the LEAs, initial Community Groups staff note this arrangement allowed the staff to solicit and fund experienced, bona fide, desegregation advocacy groups. However, the widely held perception among these groups of the government's limited commitment to desegregation, reinforced by the small size of the Community Groups staff and the delayed fund disbursement, led many organizations to conclude that the program was an effort to co-opt legitimate community involvement in desegregation. It was in this context, then, that the community groups began their federally funded operations in March 1971.

ESAP COMMUNITY GROUPS PROGRAM OPERATIONS

During ESAP I, the $7.5 million community groups appropriation was used to fund some 150 organizations in 14 southern and southeastern states from March through June 1971. According to HEW officials and Community Groups staff, the ESAP I groups were relatively autonomous. Their funding was fostered by staff at the federal and regional levels who supported the concept of independent community groups working to promote school desegregation. Concerted efforts were especially made in the Atlanta regional office to secure funding for bona fide, grass roots desegregation advocacy groups.

The funding of autonomous, advocacy oriented community groups was also fostered by the operational latitude allowed by the 1970 regulations. Specifically, the regulations promoted funding of experienced

groups by requiring applicant organizations to show proof of prior involvement in education/desegregation. Further, the regulations required "...a statement of the problems as seen from the point of view of such agency, organization, or institution...."[1] Community groups were not limited to a specific set of activities; they could choose from a general list of desegregation-related activities those most appropriate to community organizations. Finally, despite the protests of many southern LEAs, the regulations did not require community groups to have LEA approval, nor did they specify cooperative relations between the community groups and the LEAs.

The community organizations, many of which had recently been litigants in desegregation suits filed against local school boards, began to assist in implementing the desegregation process through a wide range of desegregation support activities. Kirschner (1972) and McPhee (1971) suggest that the most frequently conducted activities were community relations, information dissemination, and community based tutorials. Others included technical assistance (from black colleges to community grantees), monitoring LEA desegregation activities, interracial social and recreational activities, and activities to promote parent leadership and involvement in the schools. In general, both evaluations indicated that community organization activities were directly related to the desegregation process in the school districts.

The community groups were expected to operate autonomously, yet in support of the school district plan in addressing the problems incident to desegregation. In many districts this became an impossible task, as the districts themselves (including ESAP-funded districts) continued to resist desegregation. An investigation of 295 ESAP-funded districts found that 179 were engaged in practices that rendered them ineligible for funding (AFSC et al., 1971). Specifically, some districts received funds without submitting desegregation plans; others used funds to resegregate classrooms and to perpetuate racist stereotypes; still others used ESAP funds as general aid and bought non-desegregation related books, supplies, and equipment.

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[1] 45 C.F.R., Sec. 18.66, 1970.

Under these circumstances, many community groups developed antagonistic relationships with local school boards. Some community groups reportedly picketed the LEAs; other publicly denounced the LEAs' continued noncompliance with the desegregation mandate. According to Kirschner (1972), many of the LEAs resented that "these unqualified individuals and groups" were infringing on the "eminent domain" of the school board. In the Atlanta region,[1] school officials' resentment resulted in complaints to Congressmen about the independent and frequently adversarial activities of the federally funded community agencies. These complaints were relayed to the Secretary of HEW, and changes subsequently made in the regulations constrained the community group role in desegregation assistance.

ADMINISTRATIVE AND OPERATIONAL CHANGES

The summer of 1971 marked the beginning of a series of operational changes that altered the focus and intent of the ESAP community groups as well as the subsequent ESAA-NPOs. The initial change was in program administration and resulted in part from an effort to enhance the prospects of ESAA's passage by the Senate. The GAO and the Civil Rights coalition issued evaluative reports criticizing the administration of the ESAP-LEA program; the Civil Rights coalition accused the government of funding LEAs that continued discriminatory and segregationist practices. The coalition also criticized the "hasty and haphazard" way in which money had been distributed to the districts, noting that the guidelines for ESAP-LEA funding were generally acceptable, but the administration of those guidelines was unacceptable (Martin, 1971; Morgan and Mosher, 1974). OE staff recall that these criticisms of the LEA component of ESAP threatened the passage of ESAA in the Senate. To counter this possibility, OE officials decided to create a larger, more efficiently managed Equal Educational Opportunity Program.

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[1]The Atlanta region includes the Southern states where segregationist laws were most deeply entrenched: Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee.

Highly placed OE officials also contend that the decision to create a new EEO administrative structure provided a solution to problems with the Community Groups program. The understaffed and relatively inexperienced Community Groups Office drew frequent criticism for its administrative procedures, and it was felt by OE officials that the new administrative structure would improve the Office's administration of the program. More importantly, the officials note, it was felt that the relatively autonomous, advocacy oriented community groups could be brought under control if placed in an administrative structure responsive to school districts.

Thus, the DEEO which had administered both Title IV of the Civil Rights Act, and the ESAP-LEA program was upgraded from a Division to a Bureau, the Bureau of Equal Education Opportunity (BEEO). The newly created BEEO continued to administer Title IV and the ESAP-LEA program, and also administered the ESAP Community Groups program as a separate entity within BEEO. Dr. Herman Goldberg, a former northern school superintendent, was appointed to the position of Associate Commissioner, BEEO, by Education Commissioner Marland. Goldberg, who had spent the previous few months in the Bureau of Elementary and Secondary Education (BESE), recalls the major task facing him in the new position as that of consolidating and more effectively administering the various components of federally funded desegregation assistance. This task required reducing the likelihood of political influence in the funding process, a goal that was addressed through the establishment of a set of consistently applied procedures and criteria for funding both LEA and Community Groups grants.

Although the Community Groups Office first operated as a separate entity within BEEO, it was ultimately merged with the Title IV and ESAP-LEA programs. There were at least two apparent reasons for this merger. First, according to Goldberg, it was inefficient in terms of both financial resources and program administration for separate groups of program officers to monitor different programs in the same geographic area. Thus, the merger of the Community Groups Office was the Title IV and EASP-LEA programs allowed for monitoring on a geographic, rather than programmatic, basis.

A second reason for the merger involved efforts to strengthen the staffing and administrative operations of the Community Groups Office. To this end, a black community groups coordinator and three white consultants were hired to work with Community Groups Director Mel Johnson. The three consultants developed a scheme which required funded community groups to contract services with the consultants' own private consulting form. This scheme was uncovered by a Community Groups Office staff member. The subsequent Justice Department investigations resulted in indictments, but the consultants were not prosecuted, and no BEEO staff were in any way implicated in the incident. The scandal, however, provided further support for merging the Community Groups Office with the ESAP-LEA and Title IV programs. This merger was also effected in the Dallas and Atlanta regional offices, causing a regional program officer to comment,

> ...whatever identity the program had as being administered (regionally) by minorities, whatever identity the program had as being committed to desegregation, was lost in the merger with the LEA program....

According to BEEO staff, the administrative restructuring was merely a prelude to the operational changes that took place in the community groups program. Staff members generally acknowledge that concomitant with the administrative restructuring, there was a move within BEEO to integrate the desegration assistance programs into the larger OE structure. As part of this move, several BEEO staff members recall an effort to create a BEEO identity as a program oriented toward global educational needs, rather than toward more specific desegration assistance needs. In general, the program tried to become more responsive to LEA concerns and complaints. Consequently, the role of community groups as independent supporters of the desegration process was deemphasized.

These staff perceptions were given credence by a series of events that began even prior to the change in administrative structure. In mid-June 1971, an end-of-year review of the community groups program concluded that "...the vast majority (80-85 percent) of these

(community group) projects can be carried on with no reference to the LEA's activities...and that...few of the projects require any direct access to the school system or to an individual school within the school system."[1] Despite OE's conclusion that community groups could function independently of LEAs, the issue of LEA approval of community groups continued to be a salient one. In July 1971 the issue was repeatedly raised in a series of issue papers sent by HEW staff to the Secretary prior to the 1971-1972 funding cycle. One memorandum provided the Secretary with three possible options regarding LEA control over community grants:

1. The LEA should have the right to veto the proposal of a community group requesting group funds.
2. The LEA should only have the right to comment on the community group proposal.
3. The LEA should have no rights concerning community group proposals.

Another memorandum noted that the Secretary's advisers had reached a consensus "...that HEW should give school districts the right to comment on the proposals submitted by community groups...." The memorandum further urged immediate action in endorsing this consensus, "...to avoid any expectation that HEW will give LEAs the right of veto over community groups' applications...," and "...to prevent misunderstanding in one of the program's most sensitive areas."[2]

The Secretary apparently accepted his advisers' recommendations. When the revised ESAP program regulations were issued in August 1971, community group applications were required to "be accompanied by the comments (if any) of the local educational agency in the school district of which the project to be assisted will take place."[3] No further provisions were made in the regulations for LEA-Community Groups

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[1]Office of Education Memorandum, "The ESAP Community Group Program," June 1971.

[2]Office of Education Memorandum to the Secretary of HEW, July 1971.

[3]45 C. F. R., Sec. 181-6(b)5, 1971.

coordination or cooperation. Thus, while LEAs were not given veto power over Community Groups applications, the regulations signaled the first official curtailment of Community Groups autonomy. However, no limitations were placed on Community Groups activities, and authorized activities for both Community Groups and LEAs remained the same as in the 1970 regulations.

While the regulations required only LEA comments, the *Information Handbook for Public and Private Nonprofit Organizations* issued in August 1971 by the Community Groups Office of BEEO included a detailed statement of the expected Community Groups relationship to the LEA. Essentially, the Handbook noted that Community Groups activities should be in support of the LEA plan, and further, that the community groups should seek the cooperation of the LEA in developing the proposal. Finally, as Kirschner notes, the Handbook (p. 53) specifically prohibited the continued monitoring of LEA desegregation efforts, stating that "...the Office of Education will not fund proposals which monitor LEA performance in carrying out the desegregation plan."

The requirement that community group proposals be accompanied by LEA comments (if any), and the detailed requirements for LEA-Community Groups interaction outlined in the Handbook, reaffirmed for many community organizations the notion that the program co-opted community advocacy for desegregation. Community groups were well aware of political pressure applied by the LEAs for control over community groups activities, and viewed the requirement for comments and further coordination as OE capitulation to LEA demands. Moreover, McPhee (1971) notes, groups that had been most active in promoting desegregation were required to cooperate with and to have their proposals reviewed by (interpreted widely as "approved by") the very entities that had continued to resist desegregation. According to one desegregation activist, such an arrangement impaired the credibility of the bona fide desegregation assistance groups and caused the more activist groups to stop applying for Community Groups funding.

These administrative and operational changes were vigorously opposed by the Civil Rights coalition as well as the community groups in the Dallas and Atlanta regions. In Atlanta, community groups held

rallies in protest of the loss of organizational identity at the regional and federal levels, and the loss of operational autonomy at the local level. For the Civil Rights coalition, which had helped develop and had lobbied vigorously for the Community Groups provision, the program's change of direction signaled defeat for advocacy-oriented federally funded organizational involvement in school desegregation. According to Winifred Green of the AFSC, the Civil Rights coalition could no longer support the Community Groups program. Thus, long before passage of the Emergency School Aid legislation, two significant events had occurred. First, the Community Groups program had lost its initial supporters, the Civil Rights coalition, who constituted an independent external constituency. Further, administrative and operational changes had been instituted which ultimately limited the NPO role in facilitating school desegregation.

CURRENT PROGRAM IMPLEMENTATION

The Statute

In June 1972 the basic provisions of ESAP were enacted as the Emergency School Aid Act (ESAA).[1] The statute (P.L. 92-318) was enacted with minimal support from Congressional liberals (Fagan, 1973) some two years after President Nixon initially introduced the legislation. The basic purposes of the Act were to provide financial assistance to

- Meet the special needs incident to the elimination of minority group segregation and discrimination among students and faculty in elementary and secondary schools;
- Encourage the voluntary elimination, reduction or prevention of minority group isolation in schools with substantial proportions of minority group students;

[1] ESAA was enacted as Title VII of the Education Amendments of 1972 to the Elementary and Secondary Education Act of 1967.

- Aid school children in overcoming the educational disadvantages of minority group isolation.[1]

While the amended Act (1974, P.L. 93-380) authorized the appropriation of $1 billion for fiscal year 1973, and a similar amount for the period ending in June 1976, actual appropriations amounted to $270 million for fiscal year 1973, $234 million (FY1974), $215 million (FY1975), and $245 million (FY1976). Eight percent of the appropriation is targeted to private, nonprofit organizations (referred to as NPOs, rather than Community Groups). The remaining 92 percent of funds are primarily targeted to the LEA for use in the Basic Grants program (which has the objective outlined above), the Pilot program (which provides compensatory education for children in minority-isolated schools), and Special projects (educational television, discretionary funds, etc.).

The statute represents a significant compromise between the Administration bill's initial focus on compensatory education and general aid to Southern court-ordered districts, and the Mondale bill's focus on categorical aid to support integrated education on a national basis. The Act provides ESAA funds on a nationwide basis, although the funding process favors the South. And, not surprisingly, the ESAA program has a strong remedial education focus,[2] with remedial services listed in the statute as the initial authorized activity for LEAs.

Interestingly enough, despite the controversy regarding community organization activities and relations with the LEA, the law is not restrictive in this regard. For instance, the statute describes as the purpose of the NPO program

> ...to carry out programs or projects designed to support the development or implementation of a plan, program, or activity (of the LEA)....[3]

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[1] P.L. 92-318, Sec. 702(b).

[2] U.S. Comptroller General, *Better Criteria Needed for Awarding Grants for School Desegregation*, January 1978.

[3] P.L. 92-318, Sec. 708b.

However, the statute neither requires nor restricts specific NPO activities. Nor does the statute prescribe NPO/LEA relations, other than to note that the NPO program should "...complement any programs or projects carried out by the local education agency under section 706."[1] Thus, the reported restrictions on NPO activities and the required NPO/LEA relations apparently reflect specific OE and EEOP[2] policy concerns rather than the very general strictures of the ESAA legislation.

Program Operations

While not inconsistent with the statute, EEOP implements the NPO program in a manner that restricts the NPO role in school desegregation assistance. Several restrictive aspects of program implementation have been identified through site visit and mail questionnaire data on local NPO operations, as well as through interviews with regional and federal level EEOP staff. These restrictive aspects of program implementation, as well as their apparent effect on local level program operations, are discussed below.

EEOP's policy orientation both directly restricts NPOs in providing desegregation assistance and indirectly affects other aspects of program implementation. An important feature of EEOP is its apparent allegiance to LEAs. In his examination of the implementation of ESEA Title I, Murphy (1971) notes that OE program administrators, like political figures, are "subject to the demands of their constituencies and the constraints of their bureaucracies...." In OE this constituency is the local school districts, rather than community activists or desegration advocates. Crocker et al. (1976) note that OE programs are typically staffed by former school administrators, many of whom share the perspective of, and have allegiance to, the LEAs. This staffing pattern is evident in EEOP, where the majority of federal program administrators have prior experience as educators. The concern

[1] P.L. 92-318, Sec. 708 (3).

[2] BEEO was subsequently renamed the Equal Educational Opportunity Program (EEOP).

for LEA priorities is reinforced by the fact that the vast majority of ESAA funds are appropriated by law to LEAs, a sizeable and effectively organized external constituency. Thus, the NPO program, with neither a strong internal constituency (EEOP) nor an effective external constituency, is implemented by program administrators whose primary allegiance is to LEAs.

The effect of such an orientation is apparent from the historical resolution of major LEA-NPO conflict in favor of the LEAs. The statute provides for community groups as a separate entity to facilitate school desegration. However, the current EEOP orientation impedes the ability of the NPO to operate as an entity distinct from the LEA.

Perhaps the most critical aspect of EEOP's policy orientation is the lack of a desegregation advocacy focus in a program responsible for desegregation assistance. EEOP officials generally acknowledge that the program's function is not to advocate desegregation, but rather to make grant awards consistent with the statute, and to implement ESAA and Title IV. Thus, the single federal office responsible for desegregation assistance functions merely as an administrative and procedural entity. However, given the political sensitivity of school desegregation, it is unrealistic to charge the small, unprotected NPO program with promoting desegregation unless it has strong support from the implementers of executive branch policy.

The effects of this policy orientation on other aspects of program implementation are described below.

NPO Autonomy. The issue of LEA power and the NPOs has been a salient one since the Community Groups provision was initially proposed. Originally, LEAs had no authority concerning Community Groups. However, by the time ESAA was enacted, the ESAP regulations had authorized LEAs to comment on community group proposals, and EEOP guidelines required community group cooperation with LEAs.

Even after ESAA enactment, some LEAs continued in their attempts to limit NPO autonomy. During the period of comment on the proposed

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[1] BEEO was subsequently renamed the Equal Educational Opportunity Program (EEOP).

ESAA regulations, for instance, LEAs requested that OE fund only those NPOs whose services had been first requested by the LEAs. OE rejected this request, noting that while NPO efforts to cooperate and coordinate with the LEA would be applauded, there was no reason to assume that NPOs could not operate effectively without prior LEA requests.[1] Interestingly enough, the CG provision's initial supporters were sufficiently divorced from the program that there was only one protest that the substance of the regulations, in effect, provided the LEA with veto power over NPO applicants. OE denied this charge, noting that NPOs would not be penalized if they "...sought in good faith, but failed, to establish a working relationship with the appropriate local education agency."[2] However, the combined effect of the regulations and guidelines, and EEOP practice tend to support the community organization perception that the program office promotes LEA control over NPOs.

For example, while the ESAA statute requires only that the NPO program be complementary to and in support of the LEA plan, subsequent regulations, and EEOP guidelines and practices go considerably further in promoting LEA dominance over NPOs. The regulations require the applicant NPO to provide the LEA with 15 days to review the NPO proposal, offer recommendations, and submit comments to the Assistant Secretary.[3] The regulations also require the NPO to describe provisions for effective liaison with the LEAs.[4] Moreover, early guidelines went even further, noting that "A major emphasis of the Nonprofit Organizations Program is close cooperation between the nonprofit organization and the LEA."[5] This notion continues to be reinforced by program officers, who, in pre-grant technical assistance meetings with prospective NPO applicants, stress the significance of NPOs developing

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[1] *Federal Register*, Title 45, Chap. 1, Vol. 38, No. 4, Part 185C9, 1973.

[2] Ibid., Part 185C10.

[3] *Federal Register*, Title 45, Chap. 1, Subpart G, Sec. 185.63(b)(3)(i).

[4] Ibid., Sec. 185.63(b)(13)(iii).

[5] Office of Education, *Manual for Program Officers: Technical Assistance for Nonprofit Agencies*, 1975, p. 6.

and maintaining cooperative relations with the LEAs. During these meetings, NPOs are also urged to submit letters of comment/recommendation from the LEAs with their applications. OE maintains that such letters simply provide evidence that the LEA is aware of the NPO's proposed activities. However, a review of the 1976-1977 letters revealed that the vast majority went beyond mere acknowledgment of the NPO's proposed activities. Rather, they evaluated the need for the proposed activities, as well as the NPO's plan for implementing the activities. In effect, then, the NPO's proposal is evaluated by the LEA as well as by the review panel.

Further, the proposal review process weights equally NPO cooperation with the LEA in needs assessment and the magnitude of need the NPO addresses. Thus, an NPO proposal without a strong letter of LEA support, or without documentation to indicate collaboration with the LEA in needs assessment, may lose points in the review process. Finally, the four-member review panels are structured in favor of LEAs, with three panelists representing the educational system and only one panelist a community representative.[1]

The powerful position of LEAs, supported by the cumulative impact of the regulations, guidelines, and EEOP implementation procedures, affects NPOs in two significant ways. First, NPOs are limited in their choice of strategies. Our site visit data[2] indicated that the most effective community organizations used citizen action strategies, like forming coalitions, publicizing desegregation-related issues, lobbying, and publicly addressing the LEA. The data also indicated that NPOs were less likely than other community groups to engage in these strategies. NPOs were especially reluctant to protest LEA policies they disagreed with. Most NPOs attributed their public silence to their

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[1] OE review procedures involve empaneling four nonfederal reviewers. One panelist is selected from each of the following categories: (1) curriculum consultant, director of instruction, professor, SEA staff member, student; (2) building principal, assistant superintendent, superintendent of schools; (3) classroom teacher; and (4) community representative with no formal school application.

[2] See Vol. III of this series, *The Role of Community Organizations in Facilitating School Desegregation*, by L. McDonnell and G. Zellman.

perception that they could not offend the LEA, since future funding was dependent on continued LEA goodwill. Thus, OE implementation procedures result in the funding of NPOs that are less likely than other community groups to be involved in potentially effective citizen action strategies.

A second effect of LEA programmatic dominance is to deter applications from advocacy-oriented community organizations which engage in citizen action strategies. Site visit data also indicated that community organizations that used citizen action strategies to achieve desegregation-related goals often deliberately chose not to apply for NPO funds. The primary reason given for this decision was that their legitimacy in the community would be compromised by implicit requirements for LEA approval.

Authorized NPO Activities. Another aspect of program implementation that restricts the NPO desegregation role concerns authorized NPO activities. While the law does not specify or disallow NPO activities, the first three activities listed in the regulations provide for educational services: supplemental remedial services, supplemental career education programs, and innovative interracial education programs.[1] These activities are encouraged by both EEOP staff in pre-grant technical assistance meetings, and by local school officials in the joint needs assessment meetings. Not surprisingly then, site visit and mail questionnaire data showed that a large proportion of NPOs engaged in educational services, particularly remedial reading and math.[2] Further, while desegregation advocacy and monitoring activities are not prohibited by law, these activities are not encouraged by either the EEOP staff or by the LEAs during needs assessment sessions, nor are they listed as authorized activities in the regulations or on the application forms. Thus, during the site visits, few NPOs were found to engage in desegregation advocacy or monitoring activities.[3]

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[1] 45 C.F.R., Sec. 185.62.

[2] See Vols. II and III of this series for a detailed discussion of NPO activities.

[3] See Vol. III of this series.

The policy focus on educational services to the virtual exclusion of advocacy clearly restricts potential NPO effectiveness. As the site visits indicated, educational services are less effective in promoting desegregation than advocacy and desegregation-specific activities. Thus, to the extent that EEOP and school district administrators promote educational services and fail to promote advocacy acitivities, they limit the potential effectiveness of community organizations in promoting desegregation. Further, community orgarizations are generally not exceptionally skilled or experienced in providing educational services, and the continued emphasis on such activities is an implicit restriction on NPO effectiveness. Finally, since educational services are the domain of the LEA, such a program orientation serves to increase NPO dependence on the educational system.

Conclusion

Two interdependent aspects of macro-level policy implementation limit the effectiveness of the NPO program. First, the program was initially implemented in the context of conflicting signals from the executive and legislative branches regarding the extent to which desegregation was to be actively promoted. Thus, EEOP has operated with a weak federal desegregation mandate, which has limited the substantive desegregation-related support EEOP could provide the NPO program.

Another macro-level constraint on NPO effectiveness is EEOP's allegiance to LEAs. The result of this allegiance has been the implementation of procedures that reduce the independence of NPOs in facilitating desegregation. Since the legislation provides for NPOs and LEAs as separate entities working in the area of school desegregation, we suggest that procedures and guidelines should be established to encourage more independent NPO operations. We are *not* arguing against LEA-NPO cooperation and coordination; both are clearly essential to effective and efficient desegregation assistance. Rather, like two previous evaluations of the Community Groups program (Kirschner and McPhee), we are arguing against the onus of cooperation and coordination solely on the NPOs. We suggest instead that procedures be developed to promote mutual LEA-NPO cooperation and coordination.

We further suggest the elimination of procedures that encourage LEA control over NPOs (e.g., LEA written comments on NPO proposals; 15-day review). Finally, we encourage the clarification (through pre-grant technical assistance meetings, program guidelines, etc.) of LEA/NPO roles and responsibilities.

A second major consequence of EEOP allegiance to LEAs is the focus on educational and remedial services. While such activities may help meet an LEA's general aid needs, they are much less effective in facilitating desegregation than advocacy and monitoring activities. Thus, it is suggested that the authorized activities for NPOs be restructured to deemphasize compensatory and remedial services, and to emphasize advocacy and community relations activities. Finally, in order for the small NPO program to operate effectively in an organization dominated by educators, the program should be implemented by staff familiar with and sympathetic to the community group concerns. Thus, the NPO program needs a source of support and protection internal to USOE. Volume IV presents more specific policy recommendations in regard to EEOP operations.

APPENDIX A

SAMPLE DEVELOPMENT

PROCEDURES FOR SAMPLE DEVELOPMENT

The following should be used as a guide for your conversations with nominators and nominees. Specific introductory information has been provided to insure consistent explanations of research goals. The remaining information should be obtained in your own words, using the general guidelines described below.

Introduction

Hello. This is _____ with The Rand Corporation in Santa Monica, California. Rand is doing an evaluation of the Emergency School Aid Act (ESAA) Nonprofit Organization Program for the U.S. Office of Education.

As part of this evaluation, we are exploring the federal policy context in which the NPO program operates. (Specifically, we are interested in expanding our knowledge of the role played by the executive and legislative branches of government in the development of federal desegregation policy, especially as that policy is related to the development and implementation of the NPO program.)

We are attempting to obtain a sample of people to interview who are knowledgeable about school desegregation policy, the ESAP-ESAA community groups and nonprofit organizations, and the implementation of federal policies.

_____ recommended you as a person that we should speak with about _____.
(school desegregation policy, CG/NPO program, federal policy implementation)

Discussion Topics

Discuss with the person the following topics, determining the actual area of expertise/experience, when the person had the experience, what the experience was, and what government or private agency the person was employed by at the time. Record all responses on the Nominee Information sheet.

- Area of expertise
- Historical desegregation experience
- Current desegregation involvement
- Comments

Additional Nominees

Ask for recommendations of additional nominees, who have experience/ expertise in the following areas:

- School desegregation policy:
  - Executive branch initiatives
  - Legislative branch initiatives
  - Academicians or theorists
- Community groups, nonprofit organizations
- Administration of the ESAP or ESAA program
- Initial intent of community groups
- Operations of community groups
- ESAP and ESAA program regulations and guidelines

For each nominee, attempt to obtain

- Current phone number
- Current address
- Specific past or present desegregation involvement

All information should be as specific as possible. For each person nominated, fill out an additional nominee sheet. If a person is nominated more than once, fill out a nominee sheet based on the information obtained from each nominator.

Nominator _____

NOMINEE INFORMATION SHEET

NOMINEE: _____

TITLE/POSITION: _____

ADDRESS: _____

_____ PHONE: _____

AREA OF EXPERTISE (Desegregation Policy, CG/NPO Program, Policy Implementation):

_____

HISTORICAL DESEGREGATION EXPERIENCE: _____

_____

_____

_____

_____

CURRENT DESEGREGATION INVOLVEMENT: _____

_____

_____

_____

_____

_____

COMMENTS: _____

_____

_____

_____

_____

_____

CONTACTED BY: _____ DATE: _____ DISPOSITION: _____

MATRIX FACTORS

A. CG-NPO Programs

1. ESAP

   a. Intent of ESAP-CGs
   b. ESAP regulations
   c. ESAP administration
   d. ESAP operations

2. ESAA

   a. Intent of ESAA-NPOs
   b. ESAA regulations
   c. ESAA administration
   d. ESAA-operations

B. School Desegregation Policy

1. Executive branch initiatives

   a. Johnson administration
   b. Nixon-Ford administration
   c. Carter administration
   d. HEW-OCR
   e. Department of Justice
   f. USCCR

2. Legislative initiatives

   a. ESAP
   b. ESAA
   c. Current

3. Judicial rulings

C. Policy Implementation

1. Executive branch directives

   a. Johnson administration
   b. Nixon-Ford administration
   c. Carter administration

2. OE implementation

   a. Policy interpretation
   b. Mission statements
   c. Regulations and guidelines
   d. BEEO/EEOP operations
   e. Discretionary authority
   f. Role of program officers

3. Regional office

   a. Proposal solicitation
   b. Pre-grant technical assistance
   c. Proposal review

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PART II

THE ESAA-NPO FUNDING PROCESS: AN ANALYSIS

by James Hyman

SUMMARY

The proper targeting of grant funds to areas of greatest need and to contractors offering the most promise of dealing effectively with those needs is crucial to the impact of federal social programs. In this report the criteria used in awarding grants under the Emergency School Aid Act's Nonprofit Organization Program are analyzed for their performance in accomplishing this targeting.

During FY 1976, the Emergency School Aid Act's Nonprofit Organization Program awarded $17.2 million to 215 nonprofit organizations (NPOs) to aid local school districts with desegregation or the reduction of minority isolation. Eight percent of the ESAA appropriation was reserved for the NPO program, and this amount was then apportioned to states on a ratio formula. The apportionment per state was equal to the NPO appropriation times the ratio of the number of minority children enrolled in the state to the number of minority children enrolled nationwide.

Applications for NPO grants were evaluated on two sets of criteria--Statistical Criteria and Proposal Quality Criteria. The Statistical Criteria are a set of four scales which award points to proposals in accordance with certain district data that are intended to evince the district's need for an NPO project. These four scales award points for: (1) the size of the minority enrollments; (2) the percentage concentration of minorities in enrollment; (3) the absolute net reduction in minority isolation; and (4) the percentage net reduction in minority isolation.

By contrast the Quality Criteria are a set of five scales which attempt to evaluate the merits of the proposals themselves. These scales evaluate the proposals' objectives, needs assessments, proposed activities, and their resource management and evaluation strategies. The points on these scales are awarded by panelists during proposal review sessions. The statistical and quality scores are then summed to form the Final Project Ratings, and applicants are

funded according to this score until the state apportionment is depleted.

Analysis of the Statistical Criteria indicated:

- o that these criteria operate to the advantage of larger school districts (i.e., those with larger numbers of minority students) irrespective of their proportionate minority concentrations, and
- o that, as a result, the statistical criteria operate to the disadvantage of smaller districts--even those highly impacted with minority students.
- o that the statistical criteria measure cumulative desegregation progress rather than current desegregation effort and thereby operate to the disadvantage of activity desegregating districts with phase in desegregation plans, and
- o that no mechanism exists in these criteria to phase out or disqualify districts that are long past completion of desegregation. Such districts continue to register a desegregation need and effort on these measures.

Analysis of the Proposal Quality Criteria revealed:

- o that all five scales predict Final Project Ratings, and
- o that the scale evaluating the proposed activities is the major determinant of the quality criteria scores.

Analysis of the interaction of the Statistical and Quality Criteria showed:

- o that the two sets of criteria are equally predictive

of the Final Project ratings--neither is dominant, but

- because of the intervening impacts of state apportionments the two sets of criteria are *not* equal in determining the probability of funding. The quality scores become dominant.

Investigations into the apportionment impacts showed:

- that the apportionment to states suppresses the impact of the statistical scores,
- that the elimination of state apportionments would double the impact of the Statistical Criteria and would result in a (tremendous) shift of NPO projects from the Midwest to the Southeast region, and
- that this shift is caused by greater measured desegregation effort in the Southeast and *not* by a higher quality of proposals.

The final question addressed was whether the funding criteria promote the funding of effective NPOs. The analysis indicated:

- that the Quality Criteria on the whole show only a weak tendency to identify potentially effective NPOs and that, within the Quality Criteria, two scales (resource management and evaluation) fail to show *any* relation to NPO effectiveness,
- that the Statistical scores on the whole are uncorrelated with measures of NPO effectiveness such that, *taken alone*, they neither facilitate nor impede the selection of potentially effective NPOs for funding, and
- that the addition of the Quality and Statistical scores creates a Final Project Rating that is uncorrelated with NPO effectiveness. On the whole

the proposal ratings process neither facilitates nor impedes the funding of effective nonprofit organizations. Effectiveness is randomly associated with the Final Project Ratings.

Based on these findings we concluded that the proposal ratings process needs improvement to insure better targeting of funds to areas of greatest real need and to increase its potential for selecting effective NPOs. The following policy options are geared to these ends. It is recommended that a set of Quality Criteria be used as the primary basis for NPO grant award with the following provisos:

- That the resource management and evaluation criteria be eliminated from the current Quality Criteria since neither contributes to the identification of potentially effective NPOs.
- Because 93 percent of whatever it is that constitutes an effective NPO is explained by factors not currently considered in the Quality Criteria, it is essential that other predictive variables be identified and included in the proposal ratings process if the process is to better identify potentially effective NPOs.

With regard to the Statistical Criteria, alternative strategies are as follows:

- Since the Statistical Criteria do not aid in the identification of potentially effective NPOs (in point of fact, they actually nullify the correlation between the Quality scores and effectiveness when the two are added to form the final project ratings), they should be dropped from the proposal ratings process.

- However, if federal policymakers wish to maintain some control over where NPO funds are dispersed, the Statistical Criteria can be used--but only as prescreening eligibility criteria with a specified minimum in points that would qualify districts for NPO funds. Depending on the level at which the minimum is set, this approach could neutralize the current large district bias.
  Alternatively, the minority enrollment scales could be dropped so that the net reduction scale alone would be used as prescreening eligibility criteria. This approach offers the advantage of making eligibility solely a function of the current desegregation effort. But because this approach would nullify the funding chances of community organizations in minority isolation districts, taking this approach is tantamount to a policy decision not to fund minority isolation districts under the ESAA-NPO program.
  A third alternative is the use of the percent net reduction scale by itself as a prescreening criterion. This approach would standardize for differences in the number of students reassigned--measuring effort only in terms of relative desegregation efforts by considering only proportionate reductions in minority isolation.
- To eliminate the Statistical Criteria bias in favor of earlier desegregated districts it is recommended that the method for calculating absolute and percentage net reductions in minority isolation be changed to include a revolving base year (i.e., lagged one or two years behind the project year) instead of the static base year currently used. Such an approach would make district desegregation efforts temporally comparable while at the same time provide a phase-out mechanism for districts that have completed desegregation.

No policy options were made with respect to the state apportionment procedures since decisions on this issue lie outside the prerogatives of program offices. However, a simulation of funding outcomes using the existing set of Quality Criteria, without apportionment, shows little or no change in the current regional distributions of NPO projects--indicating that, with the recommended changes in the proposal ratings process, apportionments may not be necessary to assure state share.

I. INTRODUCTION

One of the important considerations for the impact of any federal social program is the criterion on which funding allocations are made. Clearly, allocation policies that are neither well targeted in terms of the needs the program is to address nor well targeted to institutions offering the promise of dealing effectively with those needs, can have a debilitating impact on the overall efficacy of a program. As such, federal allocations policies may indeed define the upper and lower boundaries of federal programmatic impacts.

The following pages, then, present an analysis of the funding criteria employed in selecting the nonprofit organizations (NPOs) to be funded through the Emergency School Aid Act (ESAA). These investigations are geared to evaluating the performance of these selection criteria as related to where funds are disbursed and the implications of these criteria for the effectiveness of the ESAA-NPO program. As such, this section has three major foci. The first is to determine the extent to which the funding process selection criteria are biased in favor of particular types of districts from which NPOs might apply. For example, some community group leaders alleged, during field interviews, that they did not apply for ESAA-NPO funds because they perceived the program to be biased in favor of large districts and felt that the chances of their receiving funds in smaller but highly concentrated minority districts were too slight to warrant the proposal effort.

Second, these investigations attempt to discern the impacts and interactions of the selection criteria as they affect the probability of NPO funding. The principal question researched here is whether the "Statistical" scoring criteria for NPO selection, based on data evincing district need, impede the funding of projects judged to be potentially effective on the proposal "Quality" rating scales. Finally, these investigations seek to determine the relations existing between the proposal ratings process and the effectiveness of the nonprofit organizations funded by the program in an attempt to discern the

extent to which these funding criteria actually promote the funding of effective NPOs.

THE FUNDING PROCESS--A DESCRIPTION

During the 1976 fiscal year the Nonprofit Organizations Program of the Emergency School Aid Act received some 401 applications from organizations in 45 states requesting a total of $59.2 million in federal assistance to assist local districts with desegregation and/or the reduction or prevention of minority isolation. Of this number, 215 were funded at a total cost of $17.2 million in federal funds. ESAA funds for the NPO, Basis, and Pilot grants are apportioned to states on a ratio formula in which the state apportionment is equal to the product of: (1) the total appropriation for the NPO program; and (2) the ratio of the number of minority group children aged 5-17 inclusive, in the state, to the number of minority group children in all states. This apportionment is subject to a minimum of $100,000 per state. Eight percent of the apportionment is reserved for the NPO program and unused state funds are reapportioned on the same ratio. The apportionment of program funds to the states assures that each will be able to participate in the NPO program and do so in direct proportion to the state's concentration of the nation's minority school-aged population. Table 1 presents data on the 1976 fiscal year funding outcomes by region.

Proposals for ESAA-NPO funds were submitted to the DHEW regional offices and were rated on two sets of criteria--Statistical Criteria and Quality Criteria.[1] The Statistical Criteria are composed of four rating scales which award points, up to a maximum of 40, in accordance with certain *district* data used as proxy measures of district desegregation needs. By contrast, the Quality Criteria are composed of five separate ratings given each proposal by each of several (typically four) panel judges during proposal review sessions held at the DHEW Regional Offices. The statistical and quality scores are then summed to obtain a final score on which proposals are ranked. Projects are then funded in rank order until the state apportionment of funds is depleted. Because these scores are used to determine which

[1]The ESAA-NPO awards process is now to be centralized in Washington, D.C. But it is anticipated that the process will remain essentially the same.

Table 1

EMERGENCY SCHOOL AID SUMMARY OF FISCAL YEAR 1976 FUNDING

State Apportionment Funds: Nonprofit Organizations Grants

	Regional Center[a]	Funds Available	Funds Approved	Number of Applications Received	Number of Applications Funded
I.	Boston	$ 328,193	$ 280,523	12	6
II.	New York City	2,182,232	2,213,444[b]	60	15
III.	Philadelphia	1,726,121	1,708,748	32	20
IV.	Atlanta	3,885,147	3,940,717[b]	73	48
V.	Chicago	2,426,754	2,337,450	42	26
VI.	Dallas	2,949,688	2,991,878	73	41
VII.	Kansas City	423,590	406,818	10	8
VIII.	Denver	312,298	314,968[b]	25	13
IX.	San Francisco	2,741,787	2,778,059[b]	67	33
X.	Seattle	224,190	224,739	7	5
	Total	$17,200,000	$17,197,342	401	215

[a]States served by each regional center are as follows: Region I: Connecticut, Maine, New Hampshire, Rhode Island, Vermont. Region II: New Jersey, New York. Region III: Delaware, Washington, D.C., Maryland, Pennsylvania, Virginia, West Virginia. Region IV: Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee. Region V: Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin. Region VI: Arkansas, Louisiana, New Mexico, Oklahoma. Region VII: Iowa, Kansas, Nebraska. Region VIII: Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming. Region IX: Arizona, California, Hawaii, Nevada. Region X: Alaska, Idaho, Oregon, Washington.

[b]In some regions funds approved are greater than funds available because of the reapportionment of unallocated NPO funds from states in other regions.

nonprofit organizations get funded, an analysis of interactions of the ratings scales is essential in understanding the internal workings of and eventual funding outcomes of the proposal ratings process.

II. THE STATISTICAL CRITERIA AND ALLOCATIONS BIAS

The Statistical Criteria, as *originally* designed for the ESAA *Basic Program*, are a set of four scales. On these scales, points are awarded to applicants according to district data showing the district's need for NPO funds. But the inclusion of statistical scores as criteria for *NPO* funding served an additional purpose. In general, to be eligible for an ESAA-NPO grant, organizations must propose to serve a district that is eligible for assistance under the stipulations of the ESAA Basic Grants Program.[1] A Local Education Agency (LEA) is eligible for a Basic Grant if it: (1) is implementing a desegregation plan or a plan to reduce minority isolation pursuant to a court or other agency order; (2) has voluntarily adopted and is implementing said plans; or (3) has adopted and is implementing a plan to reduce minority isolation in one or more of its schools. While the NPO eligibility criteria generally insure that NPO funds will flow to districts eligible for ESAA Basic Grants, they do not prohibit NPO funds from flowing to non-funded, Basic-eligible districts. And because of preferences in the program offices for the two programs to be run in tandem, and in particular for the NPO projects to be channeled toward districts scoring highest on the Basic Grant Statistical criteria (i.e., those evincing greatest desegregation needs), statistical criteria were included in the NPO funding criteria. As such, districts showing greatest need for ESAA Basic Grants also show the highest need for NPO projects.

The process for evaluating ESAA-NPO proposals is the same as that used in the Basic Program, but with one major difference. In the evaluation of Basic Grant proposals, the statistical scales award a maximum total of *80* points and are clearly intended to dominate the

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[1] Exceptions to this general rule are noted in *Volume II: A Description of Local Program Operations*, by S. Crocker and P. Sperlich.

proposal quality ratings which award a maximum of only 45[1]--the resulting trend being that dollars flow to districts of greatest need as opposed to high quality projects. However, in the proposal rating process for NPO Grants the maximum total Statistical score was halved to 40 points in an effort to prevent *all* of the NPO funds from going to large Basic Grant districts while maintaining some propensity in that direction. This section will present analyses of the statistical criteria as they operate in the NPO grants process, in an effort to document the extent of current program biases engendered by the statistical point rating scales. Data for these investigations were taken from the fiscal year 1976 ESAA-NPO Application Abstracts for 345 completed applications.

MINORITY ENROLLMENT SCALES

As presented in Table 2, the first two statistical criteria scales award points to proposals according to both the relative and absolute sizes of the minority enrollments in the district the NPO proposes to serve. The larger the minority enrollments on either scale the more points are awarded and, by implication, the more the district exhibits the need for an NPO project. This measurement of minority enrollments in both absolute and relative terms is intended as an offset to assure, for instance, that smaller districts with larger percentage concentrations of minority students are not preempted in their funding chances by very large districts with relatively larger absolute minority enrollments but relatively smaller percentage concentrations and vice versa. Analysis of the impact of these two scales on the total statistical scores and on the final scores (i.e., the statistical scores plus the quality scores) of proposals clearly shows one scale to dominate the other.

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[1]See Emergency School Aid Act--P.L. 92-318 as amended by P.L. 93-380 (1974), as amended by P.L. 94-482 (1976): Program Management Procedures, DHEW, U.S.O.E., Bureau of Elementary and Secondary Education, Equal Educational Opportunity Programs, December 5, 1976, Appendix C, pp. 1-3.

Table 2

STATISTICAL SCORE ENROLLMENT POINTS

Rating Scales for Nonprofit Organization Grants

	Percent Minority Students	Points
Percentage of minority students in LEA (7 point maximum for nonprofit organizations)	Over 70	7
	60 - 69.9	6
	50 - 59.9	5
	40 - 49.9	4
	30 - 39.9	3
	20 - 29.9	2
	10 - 19.9	1
	Under 10	0

	Minority Students	Points
Number of minority students in LEA (8 point maximum for nonprofit organizations)	Over 50,000	8
	30,000 - 49,000	7
	15,000 - 29,999	6
	8,000 - 14,999	5
	6,000 - 7,999	4
	4,000 - 5,999	3
	2,000 - 3,999	2
	100 - 1,999	9
	0 - 99	0

Table 3 presents a matrix of Pearson correlation coefficients showing the pairwise correlations existing between each of the Statistical criteria, the total Statistical score and the Final Project Rating (i.e., the sum of the Statistical and Quality scores). While Table 3 shows the scores on the rating scale measuring *absolute* minority enrollment to be significantly and positively associated with both the total statistical scores and the final project ratings (at .57 and .37 respectively), the scores on the minority *percent* rating scale fail to show significant correlations with either (.08 and .09).[1] These results indicate that this scale, which is intended to reward districts in proportion to their percentage minority concentrations, is not at all predictive of either the total statistical score, which

Table 3

MATRIX OF PEARSON CORRELATIONS OF STATISTICAL CRITERIA, TOTAL STATISTICAL SCORES AND FINAL PROJECT RATINGS

	1.	2.	3.	4.	5.	6.
1. Proposal final score		.725	.373	.082	.646	.356
2. Total statistical score			.571	.088	.920	.414
3. Minority enrollment points				.339	.440	-.365
4. Minority enrollment % points					-.148	-.467
5. Minor isolation points						.369
6. Minority isolation % points						

is intended to reflect district need, or the final project rating, which forms the primary basis for funding. Variations in the points awarded on this scale are not significantly associated with variations

[1]Further investigation showed there to be less variation in the percent enrollment measure than in the absolute measure. The coefficient of variation (δ / μ) for the percent measure was calculated at .42 indicating that two-thirds of the observations on this variable fell within 42 percent of the mean while the absolute measure had a coefficient of variation of .51.

in total statistical or final scores. It is clear then that in considering minority enrollments the Statistical Criteria favor districts with larger numbers of minority students irrespective of their proportionate concentrations.

Buttressing this conclusion are two additional findings. First, comparisons of the 215 funded applications against the 130 that were unfunded, using a significance test of the difference between two means, revealed a significant difference in the points awarded on the scale measuring absolute minority enrollments--indicating that, on average, funded applicants were those who proposed to serve districts with significantly higher minority enrollments. But no significant difference was found between the funded and unfunded groups in the scores on the percentage minority enrollment scale--the distribution of minority proportionate concentrations being about the same. Results are shown in Table 4.

Table 4

COMPARISONS OF THE MINORITY ENROLLMENT SCORES FOR FUNDED AND UNFUNDED PROPOSALS

Item	Minority Enrollment Score	Minority Enrollment Percent Score
Funded Group		
Observations	215.	215.
Mean (μ_1)	5.236	4.604
Standard deviation	2.457	1.889
Unfunded Group		
Observations	130.	130.
Mean (μ_2)	4.364	4.621
Standard deviation	2.491	1.979
z Score ($\mu_1 - \mu_2 = 0$)	3.169*	-.0788

*Significant at .005.

Second, the results of a multiple regression analysis, in which the total statistical score was regressed on the four statistical score ratings, showed the absolute scale to explain 33 percent of the variance in the total statistical scores while the percent scale explained less than 2 percent. In short, the percent minority enrollment scale is non-functional as a proposal rating criteria and, as a result, the proportionate minority student concentration in applicant NPO districts is not being viably considered in the statistical criteria of the proposal ratings process. The implication is clear. These two scales are not offsetting. In fact, they operate to the disadvantage of small districts--even those with high concentrations of minority students.

MINORITY ISOLATION SCALES

The latter two scales in the statistical criteria, presented in Table 5, measure in both absolute and relative terms something called the "effective net reduction or prevention of minority isolation." The calculation of these absolute and percentage reduction figures is complex and their real significance not well understood by potential applicants nor by many program officers.

The effective net reduction in minority group isolation for both scales is computed as the difference between two counts over the period of time between the applicant's district base year and the project year. The base year for these purposes is defined as the school year immediately preceding the initiation of the district's current desegregation plan or plan to reduce minority isolation. The project year, on the other hand, is defined to be the year for which ESAA-NPO funds are requested. The computed value of a district's base year will change *only* if the district adopts a subsequent plan, in which case its base year figures will be computed on the year immediately preceding the initiation of *that* plan.

The calculation of the absolute net reduction begins with the assignment of a weighting to each minority student in a school to be affected by the plan in accordance with the proportionate minority concentration in that school (see Table 6). These weights are then

Table 5

STATISTICAL SCORE MINORITY ISOLATION POINTS

	Number of Minority Students	Points
Effective net reduction or prevention of minority group isolation--number of children (15 point maximum for nonprofit organizations)	Over 15,000	15
	14,000 - 14,999	14
	13,000 - 13,999	13
	11,000 - 12,999	12
	10,000 - 10,999	11
	9,000 - 9,999	10
	7,000 - 8,999	9
	5,000 - 6,999	8
	3,500 - 4,999	7
	2,500 - 3,499	6
	1,600 - 2,499	5
	1,000 - 1,599	4
	600 - 999	3
	200 - 599	2
	50 - 199	1
	0 - 49	0

	Measure	Points
Effective net reduction of minority group isolation--percentage of children (10 point maximum for nonprofit organizations)	91 - 100	10
	81 - 90.99	9
	71 - 80.99	8
	61 - 70.99	7
	51 - 60.99	6
	41 - 50.99	5
	31 - 40.99	4
	21 - 30.99	3
	11 - 20.99	2
	4 - 10.99	1
	0 - 3.9	0

summed separately for both the base and the project years. To adjust for distortions arising out of changes in minority enrollments between the base and project years, a correction factor is applied yielding results which net out changes in minority enrollment and recognize only changes in the distribution of minority students across schools.

Table 6

WEIGHTING SCHEME USED IN CALCULATING BASE YEAR AND PROJECT YEAR MINORITY STUDENT COUNTS

Minority Students in Affected Schools with the Following Percentage of Minority Students	Weight Assigned to Each Student
95 - 100%	0.0
90 - 94.9	0.1
85 - 89.9	0.2
80 - 84.9	0.3
75 - 79.9	0.4
70 - 74.9	0.5
65 - 69.9	0.6
60 - 64.9	0.7
55 - 59.9	0.8
50.01 - 54.9	0.9
0 - 50	1.0

Finally, the base year figure is subtracted from the project year figure to generate the number to be applied to the absolute net reduction scale. The following example should clarify these procedures.

EXAMPLE

The tables constructed below and on the following page represent a hypothetical school district composed of three schools with the following enrollment patterns.

BASE YEAR

School	Number of Minority Children	Number of Non-Minority Children	Total Enrollment	Percent Minority
A	3,000	500	3,500	85.7%
B	0	3,000	3,000	0
C	0	3,500	3,500	0
TOTALS	3,000	7,000	10,000	30%

Now suppose that, in the project year, these schools have the following enrollment patterns:

PROJECT YEAR

School	Number of Minority Children	Number of Non-Minority Children	Total Enrollment	Percent Minority
A	1,600	1,400	3,000	53.3%
B	1,400	2,600	4,000	35
C	1,000	3,000	4,000	25
TOTALS	4,000	7,000	11,000	35.3%

A. Total weight for the base year.

Since all minority students in the base year were in School A and since School A was 85.7 percent minority, the table of weights (Table 6) indicates that each minority student is to be weighted 0.2 (since this is the weight to be applied for schools in that minority range). Therefore, the total weight for this district's base year is:

$$3,000 \times 0.2 = 600.$$

B. Total weight for the project year.

In this district's project year, 2,400 minority students are in schools that are not more than 50 percent minority (1,400 in School B and 1,000 in School C). These students, therefore, are all weighted 1.0. The students in School A, on the other hand, will only be weighted 0.9, since School A is now 53.3 percent minority. The total weight for School A, therefore, will be:

$$1,600 \times 0.9 = 1,440.$$

The table below summarizes how the total weight for the project year is derived:

TOTAL WEIGHT FOR PROJECT YEAR

School	Number of Minority Children	Weight for Each Minority Child	Total Weight for Each School
A	1,600	0.9	1,440
B	1,400	1.0	1,400
C	1,000	1.0	1,000
TOTALS	4,000		3,840

C. Correction factor for *increases* in minority enrollment.

When the number of minority students enrolled in schools affected by the district's plan *increases* from the base year to the project year, a correction factor, which is equal to the total number of minority students in the *base* year divided by the total number of minority students in the *project* year, must be applied to the total of the weighted number for the *project* year.

In the above example, the total number of minority children in the base year was 3,000, in the project year 4,000. The correction factor is 3000/4000 or .75. The total weighted number for the project year is multiplied by this factor:

$$.75 \times 3,840 = 2,880.$$

D. Correction factor for *decrease* in minority enrollment.

Parenthetically, when the number of minority students enrolled in schools affected by the district's plan from the base year to the project year *decreases*, a correction factor, which is equal to the total number of minority students in the *project* year divided by the

number of minority students in the *base* year, must be applied to the total of the weighted number for the *base* year. This however does not apply to the current example.

E. Total points for absolute net reduction in minority isolation.

Subtract the base year sum of weights (600) from the corrected project year sum of weights (2,880) yeilds the number (2,280) to be applied to the Absolute Net Reduction scale in Table 5. As Table 5 shows, this hypothetical district would receive 5 points on this scale.

The percentage scale for rating the net effective reduction or prevention of minority group isolation also depends on the weightings in Table 6. For each of the two years (base year and project year), the weighted total computed above is taken as a percentage of the total number of minority students in the district in the appropriate year (the base year or the project year). This percentage figure for the base year will be subtracted from the percentage figure for the project year. The difference will then be applied to the rating scale to determine the funding points for this criterion.

EXAMPLE

A. Percentage figure for the base year.

To calculate the net reduction of minority group isolation in terms of "percentage of children" in the base year, the total weight for that year (which was computed for the hypothetical district discussed above to be 600) is taken as a percentage of the total number of minority students in the district in that year. If, in the above example, there had been, in the base school year, ten schools not affected by the district's plan, which collectively enrolled a total of 500 minority students, then the total minority student enrollment for the base year would be 3500 (3000 in schools affected by the plan plus 500 in schools not affected). The base year percentage figure would thus be:

$$\frac{600}{3500} = 17.4\%$$

B. Percentage figure for the project year.

To calculate the "percentage of children" figure for this district in its project year, the total weight for that year (which was computed above to be 3,840) is taken as a percentage of the total number of

minority students in the district in that year. If, in the project year, 600 minority students were enrolled in schools not affected by the district's plan, the total minority student enrollment for the project year would be 4600 (4000 in schools affected) and the project year percentage figure would be:

$$\frac{3840}{4600} = 83.47\%$$

C. Total points for percentage reduction in minority isolation.

To obtain this district's percentage scale points, subtract the percentage figure for its base year (17.14%) from the percentage figure for its project year (83.47%):

$$83.47\% - 17.14\% = 66.33\%$$

and refer this result to the percentage Net Reduction scale in Table 5. According to the table this district would receive 7 points.

Analysis of these two rating scales showed a result similar to the finding on the minority enrollment scales. While in this case *both* rating scales showed significant positive correlations with both the total statistical score (the correlations given in Table 3 for the absolute and percentage scales with total statistical score being .92 and .41, respectively) and the proposal final score (.65 and .36, respectively), again the absolute measure was more predictive of total statistical and final scores than was the relative measure. This finding is supported by both multivariate regressions of total statistical score on the four component scales[1] and significance tests of the difference between the means on these two scales by funded and unfunded proposals.[2] By implication, then, the scales measuring the effective net reduction in minority isolation place more emphasis (vis-à-vis the total statistical score) on *absolute* net reductions in minority

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[1] Results showed the absolute scale to explain 55 percent of the variance in total statistical scores while the percent score explained only 9 percent. The two scales are not highly intercorrelated (.37).

[2] Results showed the difference between the means score of funded and unfunded proposals to be more significant on the absolute scale than on the percent scale (Z equaled 4.87 and 2.38, respectively).

isolation. And, as in the case of the minority enrollment scale, this result seems to indicate a bias toward larger as opposed to smaller desegregating districts.

But counteracting this bias to a small extent is an additional finding. The percent minority isolation reduction scale shows (in Table 3) significant negative correlations with both the absolute and relative measures on the minority enrollment scales at -.37 and -.47 respectively. These negative correlations suggest the intuitive argument that the larger the district minority enrollment, in absolute and/or relative terms, the smaller will be the percentage of reduction or prevention of minority isolation. Hence, this particular rating scale seems to work against districts with large absolute or percent minority enrollments. More specifically, it shows a slight tendency to penalize large districts--showing negative correlations with such variables as: the number of schools in the district (-.26), the size of the teaching staff (-.24), and the number of minority teachers in the district (-.23). But because this variable accounts for only 9 percent of the variance in the total statistical scores as compared to a combined 36 percent explained by the statistical criteria enrollment scales and a combined 89 percent explained by the two absolute measures (i.e., the absolute minority enrollment and absolute minority isolation reduction scales), its influence is clearly not dominant and the bias in favor of larger districts persists.

Closer examination of these calculations reveals an additional bias in the Net Reduction scales. As demonstrated on the preceding page, the net reduction scores are based on differences in school racial compositions between the base and project years. But the use of a static base year assures that a district's score on these scales will improve in each successive year while it phases in its desegregation plan and its score will reach its maximum when the plan is completed. Thus these scales tend to measure cumulative desegregation progress rather than the current year's desegregation effort. This is clearly a bias in favor of earlier desegregated districts and against districts that are still phasing in their plans for student

reassignments.[1] Moreover, districts that have completed desegregation will continue to register desegregation efforts on these scales--when in fact no desegregation is occurring--thereby reducing the amount of funds available for awards to actively desegregating districts. While the data used in this study did not permit an analysis of the extent to which this phenomenon actually occurs in the *NPO* program, its occurrence in the ESAA *Basic* program (whose statistical point determinations are analogous) *has* been documented. A recent Office of Education analysis showed, for example, that of the 467 Basic Grant recipients in FY 1976, 112 grantees qualified under plans dated 1965-1968 and 73 under plans dated before 1965.[2]

MINORITY ENROLLMENT AND THE MINORITY ISOLATION NET REDUCTION SCALES

These two sets of statistical ratings have distinctly different purposes. The enrollment scales serve as measures of district minority concentrations which evince potential desegregation need. The minority isolation reduction scales, on the other hand, attempt to measure the exact degree of segregation or minority isolation and the magnitude of the effort expended by the district to reassign students. For instance, the ESAA legislation defines schools with higher than 50 percent concentrations of minority students as minority isolated schools. The weighting scheme shown in Table 6 gives a weight of "1" to each minority student in a less than 50 percent concentrated school, and the weights decline by one-tenth for every 5 percentage points increase in school minority concentration to reach a weight of zero for an all minority school. As such, the lower the total of the weights in the base year, the greater the magnitude of segregation for any given level of total enrollment. And for any given level of enrollment in

[1]Districts that plan to fully desegregate in one year are not affected by this bias since their incremental desegregation effort in the one year will be equal to their cumulative desegregation progress in succeeding years.

[2]"Better Criteria Needed for Awarding Grants for School Desegregation," Report of the Comptroller General of the United States, January 20, 1978.

the project year, the higher the sum of the weights, the greater the district desegregation effort. The enrollment and minority isolation scales then are used together in the statistical criteria to allow some tradeoffs in the awarding of statistical points between varying net reductions and varying enrollments. An analysis of variance, however, revealed that of the four statistical criteria rating scales, the scale measuring absolute net reductions in minority isolation is clearly dominant, explaining 56 percent of the variance in total statistical scores. The scale rating absolute minority enrollments has the second highest impact on statistical scores, explaining 33 percent of the variance followed by the percent net reduction scale at 9 percent and the percent minority enrollment scale at 2 percent. Table 7 presents a comparison of these actual weights against those intended by the program.[1] As shown in the table, it was the program's intent to place more emphasis on absolute and percent reduction in minority isolation (intended weightings of .38 and .25 respectively)--the two effort measures--than on absolute and percent minority enrollments, the two need measures. But in practice it is the two absolute scales (absolute minority enrollment and net reduction in minority isolation) which dominate and combine to explain 89 percent of the variance on total statistical scores.

Overall, then, the analysis of the statistical criteria of the ESAA-NPO proposal ratings process shows that the process does tend to be biased in favor of districts with larger numbers of minority students in enrollment. It also shows that the process is biased in favor of earlier desegregating districts. And because the scale rating the absolute reduction in minority isolation is the major determinant of the statistical scores and because the base year calculation is static and does not consider the degree of incremental reassignment from year to year, the statistical criteria will also

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[1] To determine the program's intended weights for these criteria the maximum point award allocated to each criterion was divided by the maximum possible total statistical score.

Table 7

ACTUAL AND INTENDED STATISTICAL CRITERIA WEIGHTS

Criterion	Intended weight[a]	Actual weight[b]
Absolute enrollment scale	.20	.33
Percent enrollment scale	.18	.02
Absolute net reduction in minority isolation	.38	.56
Percent net reduction in minority isolation	.25	.09

[a]Maximum points awarded divided by maximum statistical score.

[b]As determined by analyses of variance.

overestimate local desegregation efforts in the later years of the desegregation plan. For instance, districts with fully implemented plans and stable enrollments will continue to register a desegregation effort on the isolation reduction scales when in fact desegregation has ceased. It would appear then that once qualified for ESAA assistance, districts are qualified almost indefinitely.

In addition, the analysis shows the scale rating the percent minority enrollment in the district is non-functional as a proposal rating criterion since it fails to discriminate between winners and losers in the applications process and is not at all predictive of the total statistical scores. District proportionate concentrations of minority students are not being viably considered in the proposal ratings process.

III. THE QUALITY CRITERIA

As stated earlier, ESAA-NPO proposals are also rated on a set of quality criteria. Proposals receive scores on each of the five criteria from each of several, typically four, panel judges. These criteria and their maximum point allocations are given below. Analyses of the interactions of these scoring components revealed that each shows a high positive correlation with the total quality score and that they are significantly and positively intercorrelated pairwise (see Table 8).

QUALITY CRITERIA RATING SCALES

	Criterion	Maximum Number of Points
I	Needs assessment	6
II	Objectives	6
III	Activities	21
IV	Resource management	6
V	Evaluation	6

Table 8

MATRIX OF PEARSON CORRELATIONS OF QUALITY CRITERIA, TOTAL QUALITY SCORES, AND FINAL PROJECT RATINGS

		1.	2.	3.	4.	5.	6.	7.
1.	Proposal final score		.725	.620	.621	.689	.490	.618
2.	Total quality score			.835	.889	.921	.729	.805
3.	Needs assessment score				.787	.673	.554	.616
4.	Objectives score					.729	.626	.671
5.	Activities score						.565	.693
6.	Resource management score							.442
7.	Evaluation score							

As shown on the preceding page, the quality criteria explicitly assign greatest importance to the consideration of the activities proposed by NPCs--that criterion having a maximum 21 points as a possible score compared to the 6 point maxima of the other four criteria. To determine whether or not the activity scores were indeed the major determinant of the total quality scores, the simple correlations (r) between each individual quality component and the total quality scores (reported in Table 8) were squared to yield the coefficient of determination (r^2).[1] Results are given in Table 9.

As Table 9 shows, the activity score explains a higher proportion of the variance (85%) in, and hence is more predictive of, the total quality score than any other single criterion. As such, the activity scores assigned proposals are, as they were designed to be, the primary determinant of the total qualities scores.

STATISTICAL AND QUALITY POINTS AS DETERMINANTS OF FUNDING

One question still outstanding, however, concerns the relationship between the statistical scores and the quality scores as they determine the final project ratings and hence the rank ordering of

Table 9

CORRELATES OF TOTAL QUALITY SCORE AND THEIR COEFFICIENTS OF DETERMINATION

	Needs Assessment	Objectives	Activities	Resource Management	Evaluation
Total Quality Simple Correlation (r)	.835	.889	.921	.729	.805
Total Quality Coefficient of Determination (r^2)	.697	.790	.848	.532	.64

[1] Multivariate regression methods were not employed here because the high degree of intercorrelation among the independent variables would have confounded the results due to problems associated with multicollinearity.

projects in state funding queues. Of particular concern is whether or not the proposal statistical scores are dominant over the quality scores in determining final project ratings. Such a finding would indicate that funding outcomes depended more on the characteristics of an NPO applicant's district than on the caliber of its proposal and that NPOs from districts scoring high on the statistical criteria (i.e., larger or earlier desegregated districts) would be more likely to be funded irrespective of the quality scoring outcomes.

Before beginning the investigations into the dominance of either set of criteria, the sample of 345 applications had to be modified. Becuase the statistical scores are based on district specific data, two NPO applicants from the same district would have identical statistical scores. At the intradistrict level, then, quality scores would clearly be the major determinant of final score since they would be the only scores subject to variation from proposal to proposal. This restricted variance in the statistical scores tends to obfuscate the meaning of interdistrict analyses. To remove this influence, one application was selected at random from each multi-applicant district, creating a new sample consisting of 212 observations with only one applicant per district.

Separate regression equations were estimated for: (1) final project rating as a function of the statistical score components; and (2) final project rating as a function of the quality score components. Results showed the two sets of criteria to be about equally weighted in determining the final scores--the statistical criteria explained 53 percent of the variance while the Quality criteria explained 54 percent. Results are shown in Table 10. These two regression equation estimates were then used to calculate the predicted final scores. Projects were then ranked by their actual total scores as recorded on the ESAA Application abstracts and by each of the two scores predicted by the regression equations. The Spearman rank order correlation coefficient was used to make pairwise comparisons of these ranks. Again, the results show approximate equality. The final score rankings generated by the statistical criteria regression and the quality score criteria regression were correlated at .72 and .76 respectively

Table 10

REGRESSION OF PROJECT FINAL SCORES
ON STATISTICAL AND QUALITY SCORES

	Variable	Coefficient	Change in r^2
Statistical Criteria	Constant	33.0816	
	Minority enrollment	1.0763	.1433
	Minority enrollment %	1.4084	.0029
	Minority isolation reduction	.9497	.2999
	Minority isolation reduction %	1.4098	.0879
	TOTAL		.5340
Quality Criteria	Constant	13.3457	(a)
	Needs assessment	1.6154	(a)
	Objectives	.1813	(a)
	Activities	1.2455	(a)
	Resource management	.5983	(a)
	Evaluation	1.5253	(a)
	TOTAL		.54406

NOTE: Incremental changes in r^2 are not reported for the quality criteria because they are confounded by multicollinearity.

with proposal rankings on the actual final score. In summary, neither statistical criteria nor quality criteria seem to be dominant in the determination of final scores--they appear to be equally weighted.

But although these two sets of criteria appear to have equal impacts on the final scores, they are not equal in determining which proposals are funded, because of the intervening impacts of the state apportionments. Because of the state apportionments, unfunded proposals in some states may have higher final scores than funded proposals in other states. As such, the probability of funding is a function of the proposal ratings subject to the apportionment funding constraint.

IMPACT OF STATE APPORTIONMENTS

The state apportionments drastically alter the relative weights of the statistical vs quality criteria in the probability of funding. Our reduced sample of 212 applicants, one from each district, contained 131 that were funded and 81 that were not. To eliminate the effects of state apportionment we arbitrarily used 131 as the cut-off point for funded applicants and designated the top 131 scoring applicants as funded and the remainder unfunded.

An examination of the profiles of the old funded gorup (i.e., with apportionments) compared to our newly constructed funded group (i.e., without apportionments) revealed that, while there was no significant difference in the mean total quality scores of these two funded groups ($Z = -.263$), the mean total statistical score was significantly higher ($Z = 2.786$) for the new funded group of applicants. Closer examination revealed that 43 of the applicants funded in the original sample became unfunded when apportionment effects were removed, and 43 previously unfunded applicants became funded. Dropping the apportionment to states then reversed the funding outcomes for 40 percent of the applicants in our sample. An examination of the profiles of these applicants whose status had changed (i.e., from funded to unfunded and unfunded to funded) showed the newly funded 43 applicants to score significantly higher on measures of absolute minority enrollment, and absolute and percent reduction in minority isolation than the newly unfunded applicants (see Table 11). This finding indicates that the net effect of state apportionment is to decrease the impact of the statistical criteria on the probability of funding.

As a check on this finding, however, two separate logit regressions were run--one using the apportionment grouping of funded vs unfunded applicants as the dichotomous dependent variable, and the other using the new funded vs unfunded grouping (without apportionment effects) as the dichotomous dependent variable. In both cases, the total quality points and total statistical points were used as the two independent variables. The results confirmed our earlier finding. Under state apportionments each additional quality point

Table 11

SCORES COMPARISONS OF PROPOSALS WHOSE STATUS CHANGED
ONCE APPORTIONMENT EFFECTS WERE REMOVED
(N = 43)

Statistic	Quality Criteria Scores						Statistical Criteria Points					Final Project Rating
	Needs Assessment	Objectives	Activities	Resource Management	Evaluation	Total Quality Score	Minority Enrollment Points	Minority Enrollment % Points	Minority Isolation Reduction Points	Minority Isolation Reduction % Points	Total Statistical Points	
Proposals Funded with Apportionments but Unfunded Without (u_1)												
Mean	5.180	4.640	17.648	4.500	4.215	36.200	3.698	4.349	1.674	1.209	10.933	47.154
Standard deviation	.832	.934	1.992	1.101	1.011	4.482	2.425	2.318	2.244	1.959	4.695	2.524
Proposals Unfunded with Apportionments but Funded Without (u_2)												
Mean	5.145	4.349	17.802	4.634	4.343	36.279	5.349	5.093	5.884	3.023	19.349	55.628
Standard deviation	.86	1.412	2.874	1.393	1.271	6.069	2.329	1.729	4.610	2.782	6.019	3.577
δ ($u_1 - u_2 = 0$)												
	.1918	1.1271	-.2888	-.4949	-.5168	-.069	-3.2199**	-1.6871	-5.3844**	-3.496***	-7.2124***	-12.6929**

*Significant at .05.
**Significant at .001.
***Significant at .0001.

received contributes 3.5 percentage points to the probability the applicant will be funded while each additional statistical point is associated with an increase of only 1.9 percent. Without apportionments, however, the impacts are about equal, with an additional point in either set of criteria contributing an additional 3.7 percent to the probability of funding--the impact of the statistical score having almost doubled once apportionments effects were removed.

But this state apportionment procedure, through its suppression of the statistical scores, also affects the distribution of NPO projects in regions. To observe this phenomenon the apportionment impact was similarly removed from our original sample of 345 applicants, and 215 used as the dividing line between new funded and new unfunded NPOs. Table 12 shows the regional distributions with and without apportionment and the net gains and losses. As the table shows, without apportionment to states, Regions V and VII, both in the Midwest,

Table 12

REGIONAL DISTRIBUTION OF NPO PROJECTS

Region	Number of Projects: With State Apportionment	Without State Apportionment	Net Change
I	6	5	- 1
II	15	12	- 3
III	20	21	+ 1
IV (Southeast)	48	64	+16
V (Midwest)	25	19	- 6
VI	41	41	0
VII (Midwest)	8	1	- 7
VIII	13	13	0
IX	34	35	+ 1
X	5	4	- 1
Total	215	215	0

would suffer large losses in NPO projects while the Southeast, Region IV, already the most highly impacted NPO region, would show a tremendous gain.

It should be reemphasized that this shift of projects to the Southeast is caused not by differentials in project quality scores, but by higher statistical scores on average in the Southeast among previously unfunded projects. And because the statistical criteria scale measuring the absolute net reduction in minority isolation is the major determinant of statistical scores (explaining 56 percent of the variance as opposed to 33 percent explained by the absolute minority enrollment scale), this variable is the major cause of the shift in NPO funds toward the Southeast. Stated another way it is the measure of desegregation effort, in absolute terms, rather than the absolute size of district minority enrollments which causes this shift.

Table 13 has been constructed to show comparisons of the average statistical criteria component scores by region for the previously unfunded projects ranked from highest to lowest. As shown, Region IV, the Southeast region, ranks first on the Net Reduction measures while ranking only seventh and fifth, respectively, absolute and percent enrollment measures. Clearly, the shift of projects to the Southeast is caused by a higher desegregation effort in the districts housing these NPOs. But because the desegregation effort measures are biased in favor of earlier desegregated districts and against actively desegregating districts with phase-in plans, this shift would in some cases represent a transfer of NPO resources from currently desegregating districts to districts that have completed desegregation.

Our findings regarding the interface between the Statistical and Quality scores are strong and consistent suggesting that: (1) the statistical and quality scores are equally predictive of the final scores awarded proposals, and neither is dominant; but (2) because of the state apportionment procedure they are not equally predictive of funding, state apportionment suppresses the impact of the statistical scores with the result that the quality points strongly dominate the

Table 13

MEAN STATISTICAL SCORES FOR UNFUNDED APPLICANTS BY REGION

Region[a]	N	Minority Enrollment	Rank	Minority Enrollment %	Rank	Net Reduction	Rank	Net Reduction %	Rank
I	9	4.4444	6	3.0000	9	5.4444	2	2.000	5
II	14	6.1429	1	6.071	1	.5000	9	.6429	9
III	10	3.100	9	5.100	3	1.500	8	2.600	3
IV	26	4.269	7	4.577	5	6.308	1	4.808	1
V	16	4.875	5	4.563	6	4.063	4	.9375	8
VI	20	2.400	10	4.500	7	2.800	5	4.050	2
VII	4	5.750	2	5.250	2	2.750	6	1.000	7
VIII	9	5.111	3	4.111	8	5.000	3	2.000	4
IX	23	4.870	4	4.609	4	2.130	7	1.174	6
X	2	3.500	8	1.500	10	0.000	10	.5000	10

[a]See Table 1 for names of states in each region.

probability of funding; and (3) removing state apportionments from the funding process will likely displace NPO projects from the Midwest to the Southeast--this shift occurring not because of greater minority enrollments or higher quality projects in the Southeast, but because of greater measured effort, some portion of which may be due to the early desegregation of that region and the temporal bias in the effort measure.

PROPOSAL RATINGS AND NPO EFFECTIVENESS

Perhaps the final test of the proposal ratings process is whether or not it promotes the funding of NPOs that are effective in aiding desegregation and/or reducing or preventing minority isolation. The effectiveness measure used is the "Average Change Score for Activity I."[1] To investigate this question, we have constructed a correlation matrix, Table 14, showing the relations existing between the individual quality criteria, as *ex ante* effectiveness measures, and the *ex poste* effectiveness measures developed in this study and described in Vol. III of this report series. The sample consists of 57 ESAA-funded NPOs randomly selected for on site visits.

Table 14 shows that the *total* quality scores given proposals are significantly and positively associated with the ex poste effectiveness of NPOs. But the correlation is very small (at .26) and thus explains only a small portion of the variance (approximately 7 percent) in effectiveness. Ninety-three percent of the variance in NPO effectiveness is related to factors and influence not captured in the quality criteria. Moreover, two of the five quality criteria component scores (resource management and evaluation) are *not* correlated with, and

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[1] This measure is an output measure devised by this study. It attempts to measure the effectiveness of an NPO by scoring it on three dimensions of impact: (1) the type and scope of changes brought about as the result of NPO activities; (2) the implementation stage of the change; and (3) the degree to which the change facilitated desegregation or reduced minority isolation. A detailed explanation of this effectiveness measure and its components is given in Vol. III, *The Role of Community Organizations in Facilitating School Desegregation*, by L. McDonnell and G. Zellman.

Table 14

CORRELATIONS OF
SCORING CRITERIA AND NPO EFFECTIVENESS:
EFFECTIVENESS SCORE FOR ACTIVITY I

Need	.2634*
Objectives	.2215*
Activities	.2695*
Resource management	.1426
Evaluation	.0604
Total quality rating	.2634*
Minority enrollment points	-.0120
Minority enrollment % points	-.2843*
Minority isolation points	-.0308
Minority isolation % points	.0686
Total statistic points	-.1091
Final rating	.0355

*Significant at .05.

hence are not at *all* predictive of, effectiveness. Overall, however, the correlation of total quality scores with effectiveness does show some tendency, although very weak, for the quality criteria, as a group, to fund more effective NPOs.

By contrast the statistical scores, as a *group*, are uncorrelated with NPO effectives. One implication of this finding is that the statistical criteria bias toward large districts (i.e., those scoring highly on measures of absolute minority enrollment) is unfounded since the effectiveness of NPOs does not vary with district size (i.e., absolute minority enrollments). NPOs in small districts fare just as well or just as poorly on average as NPOs in large districts. There is, however, a significant negative relationship existing between effectiveness and the points awarded on the scale rating the percent minority enrollment in the district--evincing a weak tendency for NPOs in proportionately more concentrated minority districts to be *less* effective in facilitating desegregation and/or reducing/preventing minority isolation. This finding argues against funding NPOs in Minority Isolation (as opposed to desegregating) districts.

Table 14 also shows that the final project ratings obtained by the addition of the statistical and quality scores are also uncorrelated with NPO effectiveness--indicating that the proposal ratings process, *on the whole*, creates ratings of potential NPO projects which bear no relation to the potential success or effectiveness of those funded. The statistical scores, then, actually *impede* the selection of potentially effective NPOs by nullifying the predictive capacity of the quality scores. Thus the process which determines in large part which projects do and do not get funded does not facilitate the funding of effective projects. The effectiveness of ESAA-NPOs is randomly associated with the NPO program's selection criteria. As such, this process is dysfunctional as a mechanism for grants awards.[1]

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[1] This conclusion, although based only on the empirical analysis of a subsection of *funded* NPOs, is extended to the entire sample through inductive logic. Three possibilities exist for the correlation between the final scores of unfunded proposals and NPO effectiveness: (1) a positive correlation; (2) a negative correlation; and (3) no correlation. If the first outcome were true this ratings process would be in error in that it failed to fund effective projects in favor of projects whose effectiveness is random. In the second case a negative correlation would indicate that the more points awarded, the less effective the NPO. Clearly the process, if operating in this fashion, is not functioning as intended. And third, a finding of zero correlation is commensurate with our generalization above.

IV. CONCLUSIONS

As stated at the outset, the proper targeting of grants both to areas of perceived need and to potentially effective service agents is essential to maximizing the impacts of federal social intervention programs. In the preceding pages we have attempted to evaluate the performance of the ESAA-NPO funding mechanisms in these two aspects. Our conclusion is that the program could be improved on both counts because: (1) the current ratings process yields final project scores which fail to identify potentially effective service agents; and (2) the ratings process (through the statistical criteria) is biased in favor of (a) large minority enrollment districts irrespective of their proportionate minority concentrations, and (b) earlier desegregated districts irrespective of their current desegregation efforts.

Our results, as synopsized above and as detailed in previous pages, suggest several alternative strategies for improving the performance of the NPO grant awards criteria. These strategies are guided by the two major propositions which stem from our conclusions above--first, that the process be made more capable of identifying and funding potentially effective NPOs; and, second, that the current process biases be eliminated.

The strategies to be put forward also assume that the proposal ratings process should continue to reflect measures of desegregation need as well as measures to proposal merit. For instance, one obvious strategy for revising the ratings process (and adhering to the above principles) is to drop the statistical scores on the grounds (as shown in the analysis) that: (1) they detract from the ability of the process to select potentially effective NPOs, and (2) they are the source of current process biases. If such a tack were taken, the ordering of projects in the funding queues would be determined on a set of quality scores alone. A simulation of the regional funding outcomes from such a system is given in Table 15. This simulation is built on the following assumptions: (1) that the proposals were rated solely on the current set of quality criteria; (2) that state

apportionments were dropped; and (3) that the number of projects funded under this option would be the same as under the current system (215). A comparison of the "Net Change" column with that of Table 12 shows that the redistributive impacts of this approach would be slight and neutral with respect to the Southeast region. Dropping the statistical criteria and state apportionments, then, would not radically alter the regional distribution of NPO projects. It would, however, improve the effectiveness of the NPO program since the use of the quality criteria alone would better predict NPO success than does the use of the current final project ratings (i.e., the sum of the statistical and quality scores).

Table 15

REGIONAL DISTRIBUTIONS OF NPO PROJECTS

Region[a]	Current Program (1)	Quality Ratings (2)	Net Change (3) (Col. 2 - Col. 1)
I	6	4	-2
II	15	18	+3
III	20	19	-1
IV	48	48	0
V	25	24	-1
VI	41	43	+2
VII	8	5	-3
VIII	13	17	+4
IX	34	33	-1
X	5	4	-1
TOTALS	215	215	0

[a]See Table 1 for names of states in each region.

At first glance, then, this alternative appears to be a viable approach. But dropping the statistical criteria altogether would result in an abdication of control by the federal government over where NPO dollars flow (i.e., to areas of greater as opposed to lesser need). Clearly, the grant awards criteria must be revised so as to identify the potentially effective NPOs *within* the areas of highest need, and do so in a manner that will prevent the need criteria from washing out the predictive capability of the quality measures or exhibiting biases toward particular types of districts.

THE QUALITY CRITERIA

With regard to the quality criteria, our primary concern is for increasing their predictive capability such that they can better identify potentially effective projects. To this end two recommendations are made. First, as was clear from the analyses, two of the five quality scales--the resource management and the evaluation scales--are of little value as criteria since neither is predictive of NPO success. As such they should be dropped from the quality criteria. To the extent that federal policymakers desire NPO applicants to specifically address these issues, stipulations requiring applicants to state resource management and evaluation strategies can be retained as part of the applications process, but they should not receive ratings.

Second, the current quality criteria, while positively correlated with NPO effectiveness, still explain only 7 percent of the variance. Hence 93 percent of whatever it is that constitutes an effective NPO is explained by factors not captured in the current proposal ratings process. Clearly, additional explanatory variables must be identified and employed so that the ratings criteria can better predict the impacts of NPO applicants and more accurately select effective NPOs.

THE STATISTICAL CRITERIA

The statistical scores, on the other hand, as measures of need, must assume a new role as well as undergo some revision. Revision of the statistical scores is necessary to eliminate their inherent biases, while their new role would involve their deployment in a manner that does not interfere with the predictive power of the quality scores.

The major revision necessary should be geared toward eliminating the bias toward earlier desegregated districts sponsored by the minority isolation reduction scales. This bias can be remedied by allowing the base year computations to change--lagged one or two years behind the project year such that districts would compete for ESAA-NPO funds equally, on the basis of current incremental desegregation efforts instead of differential longitudinal desegregation progress. This approach would assure that, shortly after a district's desegregation plan was fully implemented and desegregation stabilized, the district would fail to be competitive for ESAA funds since it would no longer register points on the Net Reduction scales. ESAA-NPO dollars would then be freed for infusion elsewhere. Such phased-out districts could be reinstated only if enrollment patterns changed drastically enough to warrant a new desegregation plan and subsequent student reassignments. In addition to making desegregation efforts temporally comparable across districts, this revision would offer incentives for districts not to rest on the laurels of cumulative desegregation progress.

With regard to the new role of the statistical criteria, it is recommended that all or some of these scales be used as prescreening eligibility criteria. In this role the statistical scores would not influence the actual rating of proposals. Instead they would be used to qualify NPOs for assistance provided that the districts to be served scored a specified minimum number of points. After reaching the specified minimum, no additional points would be awarded. The ordering of projects in the funding queue would then be a function

only of the Quality points awarded to NPO applicants from these qualifying districts. This approach would assure that, among the districts meeting this minimum need/effort test, only the better projects (as assessed by the Quality scores) would be funded. If all four scales were deployed in this manner, this approach would increase the viability of the current minority enrollment percent scale and, depending upon the level at which the minimum were set, could nullify the current large district bias.

One alternative to the use of all four scales would be to drop the two minority enrollment scales and use the minority isolation scales alone as prescreening eligibility criteria. This approach offers the advantage of qualifying districts for NPO assistance solely on the basis of some minimal level of current desegregation effort rather than on the basis of effort and size of minority enrollment. This approach, however, would result in a major change in the program's direction since non-desegregating "minority isolation districts" (i.e., those districts so highly impacted with minority students as to render desegregation meaningless) would fail to qualify. As such, the adoption of this alternative involves a policy decision as to whether minority isolation districts should be eligible for ESAA-NPO assistance, or be supported under a separate program or not at all. The negative correlation between the percent minority enrollment and NPO effectiveness, documented earlier, suggests that the higher the district's concentration of minority students, the lower will be the effectiveness of the NPO, and argues in favor of excluding minority isolation districts from the program.

Still another option for the statistical scores is to eliminate all but the percent net reduction scale and use it alone as a prescreening eligibility criterion. This approach is justifiable on the basis of: (1) the large district bias inherent in the absolute enrollment and absolute net reduction scales; and (2) the negative impact of the percent minority enrollment scale on NPO effectiveness. This tack also offers the advantage of a single measure which will standardize for the absolute number of students reassigned and thereby

qualify districts for ESAA-NPO assistance only on the basis of current *relative* desegregation effort. As such, any two districts that plan to reduce minority isolation by 25 percent, for example, will be viewed as being the same by this method and, depending on the level of the minimum qualifying score, both will either qualify for assistance or be ineligible regardless of differences in the sizes of their enrollments.